



## CS2. Country case studies on critical junctures in the media transformation process in Four Domains of Potential ROs (2000–2020)

The aim of the second case study is to provide analysis of risks and opportunities concerning the diachronic changes in four domains defined by the project in the 21<sup>st</sup> century.

### Excerpt:



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# BULGARIA

## Critical junctures in the media transformation processes

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### Executive Summary

The case study provides analysis of some of the critical junctures in the Bulgarian media ecosystem developments, based on the research of major sources and datasets on media and journalism in the country (2000-2021). The text presents a background section regarding the social and political changes during the examined period. Critical junctures in the potential risks and opportunities of the media transformation processes in four domains (legal and ethical regulation, journalism, media usage patterns, and media related competences) are outlined.

In the field of legal and ethical regulation in the case study the most significant challenges relate to: media regulation, freedom of expression and freedom of journalists, media legislation, transposition of the European regulation, media self-regulation and accountability, COVID and legislative initiatives against disinformation, and digitization. In the context of journalism the focus is put on media pluralism, media ownership and media concentration, political and corporate influence on the media, and journalism profession – labour market and working conditions, realization of the graduates. The examination of risks and opportunities for media usage patterns is connected with lack of consistency and cyclicity of research, public trust in media, and media consumption by different age groups. With regard to media-related competencies such issues as early training to increase media and digital literacy, media literacy and fake news, media competences and media “diet”, media literacy and media pluralism are discussed. The findings may be used for comparative analysis of the critical junctures.

## 1. Introduction

### 1.1. Background

The social unrest in the late 1980s and early 1990s in Central and Eastern Europe and the rapid developments of the information and communication technologies resulted in embankment of the country on a transition to a parliamentary democracy and marketplace economy after November 10, 1989. A new Constitution that provided for a relatively weak elected president and for a parliamentary republic was adopted in July 1991. The new system initially failed to improve the living standards or create the economic growth — the average quality of life and economic performance remained lower than under the previous system well into the early 2000s. At the beginning of the transition the annual GDP growth has dropped down from 10,9% in 1988 to – 9.1% in 1990 (The World Bank, 2022).

As of 2021 Census Bulgaria’s population has decreased to 6 838 937 from 8,17 mln. in 2000 and 7,54 mln. in 2007). More than 5 million people live in cities, the older population surpasses

34%. The official language is Bulgarian, the prevailing religion is Eastern Orthodox, and the prevailing ethnicity – Bulgarians (85%), followed by Turkish (8.8%), Roma (4.9) and about 40 small minority groups totaling 0.7% (National Statistical Institute. Population, 2022). Current unemployment rate is 5.42%. GDP in Bulgaria is expected to reach 84.32 USD billion by the end of 2022. The country's economic freedom score is 71.0, making its economy the 29<sup>th</sup> freest in the 2022 Index and its overall score is above the regional and world averages (2022 Index of Economic Freedom, 2022).

The transition from one-party and centralized economy to democratic and market forms of government and economy after the socio-economic changes in the country of 1989 lasted for a long time. Only after 2001 the economic, political and geopolitical conditions started to improve and Bulgaria has achieved very high Human Development status (Human Development Index, 2022). In its annual report of 2002 the European Commission recognized Bulgaria as a country with a functioning market economy (Commission of European communities, 2002). Without a referendum, it became a member of NATO in 2004, a necessary condition for all former socialist countries to join the European Union. In 2007 the country's membership in the European Union became a reality. The country is also a founding member of the Organization for Security and Cooperation in Europe (OSCE).

Contemporary developments in the country are very controversial. Political instability and inter-party migration, insufficient legal reforms and regulatory shortcomings, as well as inconsistent economic transformation and murky business transactions privatization impacted the delayed transition.

Bulgaria belongs to the post-communist countries of concentrated political regimes, which conduct multiparty elections, but have either curtailed full rights to participate in those elections or otherwise constrained civil liberties. They comprise both political systems which have a high degree of political contestability, but with power concentrated (usually) on the executive branch of government, to those, where oligarchs and insiders capture the state. Partial economic reforms mostly fail to support effectively functioning markets. These countries exhibit high level of corruption (Jakubowicz, Sükösd, 2008, p. 29).

## **1.2. Critical junctures of major technological, economic, political, social, legal and educational changes**

Initially, the changes in the Bulgarian mass media system and the directions for its development were interrelated with the political, economic and social dynamics in the country. The processes of demonopolization, decentralization and liberalization were random and formed arbitrarily laying the foundation for building the new media environment (Raycheva, 2013). These processes were accompanied by a general shortage of financial, technological and human resources to be mobilized and concentrated in the service of the passing current priorities of change, based on the values of civil society and the mechanisms of the market place economy.

Researchers underline the fact that the creation of the democratic Bulgarian media system has taken place chaotically and without clear rules and frameworks. The reform in media policy, regulation and accountability is characterized as being slow, while the steps taken towards state emancipation, liberalization and privatization were overhasty, unpremeditated and premature. The lack of a national concept and strategy for the transitional development of the Bulgarian media environment turned out to be among the extremely important reasons for its incomplete transformation (Todorov, 2015). The systematic approach was missing, regulation was delayed and the pursuit of rapid profits in this area prevailed over the public interest. The gloomy observation is that “in the absence of clear normative standards media is increasingly seen as extension of either partisan or corporate strategies” (Smilova et al, 2011). Thus the transfor-

mation of the Bulgarian media system has been premised on party and commercial interests, on political bargaining and not on public values.

Media regulation more particularly has to be perceived as the process of creating sufficient political, legal and social guarantees for the proper implementation of freedom of expression through any means and on any service and platform. Such understanding of regulatory frameworks was not shared by the journalistic community in Bulgaria - a fact that put a negative impact on all reforms and transformations in the media system.

The consequences of that approach was that strategic economic and political allegiances have started exerting serious power over media content through direct editorial control, gate-keeping of information, bias in representation, programme choice, commercialization and the tabloidization of press and electronic media formats towards more entertainment, sensationalism and scandallousness (Georgieva-Stankova, 2011).

These deficits laid the basis for the shortcomings in media maturing, noted in the 2013 initiative of the Open Society Foundation for studying of digital media in 60 countries. Among the problem areas were the frail media legislation and regulation, the lack of energetic institutional measures against media concentration; the uncontrolled media consolidation; the departure from professional standards; the lack of pluralism of opinions and diversity of content, etc. Last but not least – it is the lack of strong and unconditional position on the part of journalistic and media associations. The positive aspects were outlined mainly around the activities of the civil society, which in specific cases had clear impacts on both politics and commercial media (Antonova, Georgiev, 2013).

Expert Georgi Lozanov sees among the main problems in this situation “the underestimated critical function of the media in relation to power (political and oligarchic); the media management by non-media interests; the lack of effect of investigative journalism; the self-limitation of the informational and educational function of the media at the expense of the entertainment one”.

During the first two decades of the 21st century, the transformation processes in the Bulgarian media ecosystem were intensified, due to the impacts of the digital technologies and the new economic models of production, dissemination and consumption of media content. These technologies improved the means and the ways of communication, which catalyzed both the horizontal exchange of information between people living in one and the same period of time and its vertical transmission to offspring. However, the media environment became much more complicated and problems in it were augmented. These processes were taking place against the background of the still unfinished transition from a full state monopoly to diversification of the media and their functioning in market conditions.

The reasons for these shortcomings are complex. Particularly media property and media concentration have never been dealt with properly through an adequate and transparent regulatory framework. On the other hand, the attitude of journalists towards non-transparent media ownership and the distribution of print publications according to a study “Journalism without Masks” carried out by the Association of European Journalists - Bulgaria (AEJ-Bulgaria) and Alpha Research Sociological Agency has remained unchanged since 2015. It pointed that this is a problem of ultimate importance – for journalists and for the future of the media. Every second respondent noted that regulating media ownership and cross ownership is the first measure that should be applied to improve the media environment in the country (55%) (Valkov, 2020). The lack of meaningful initiatives in this respect and the disunited journalistic community have left politicians to take the lead and suggest ineffective models.

Thus a critical merge of politics, business and the media threatened freedom of expression and freedom of the media. Deregulation of the radio and television broadcasting sector was

protracted, giving way to the rise of two interrelated processes - politicization of media and mediatization of politics (Raycheva, 2014). Since the beginning of the new century, these processes have accelerated with the widespread use of digital technologies in everyday communication. It is notable, though, that, according to the World Press Freedom Index, while in 2006 - the year before accession to the European Union, Bulgaria ranked 36<sup>th</sup>, while in 2020 it collapsed to 112<sup>th</sup> place among 180 countries in the world, as a major consequence of the four freedoms of movement of goods, capital, services and people of the European single market (Reporters without Borders, 2020).

In 2021, Bulgaria ranks among the Member States of the European Union with an average level of digitalization (European Commission 2021). Digital skills, quality, and connectivity in the private sector are still low. The only exception is given by openness indicator, which is in line with the European average. According to EU's Digital Intensity Index 2021 Bulgarian business has the lowest level in the EU in digitalization and investment in digital technologies (European Commission (Eurostat) 2021). This certainly does not apply to the major media and telecommunications companies in Bulgaria. However, the country is experiencing significant delays and difficulties in building an e-government to consolidate e-data and services for the benefit of businesses and citizens. Experts report that there is not sufficient information about Internet policies in the country.

Data provided by the National Statistical Institute present the trends for the media developments in the country. The decrease in titles and circulation in print media is notable: in 2020 there were 209 newspapers with annual circulation of 123, 287 mln copies (dailies - 33; published 2-3 times a week - 11; published less than once a week - 71; and weeklies - 94). In comparison, prior to the EU accession in 2007 there were 423 newspapers on the market with annual circulation of 310, 023 million copies. Radio stations and TV channels mark decline versus increase in hours broadcasted. While in 2007 there were 222 national television channels with 599 135 hours of programming and 150 radio stations with 591 836 hours of programming, in 2020 they were reduced to 120 TV channels (779 830 hrs.) and 77 radio stations (635 102 hrs.). On the contrary, Internet penetration for households in the country has increased more than four times for the same period: 17.0 % (2007) to 78.9% (2020) (National Statistical Institute. Culture, 2020).

Despite the rapid development of ICT and online services, television continues to be the most preferred source of information and entertainment for most Bulgarian households. In addition to traditional media and online-only news sites, using of other social media platforms, as well as networking and microblogging services such as Facebook, Google Plus, Instagram, Twitter, TikTok, and hashtags, is becoming more and more popular. The use of online social networks every day or almost every day is 56 % (in EU it ranges from 46% in Germany and France, to 77% in Lithuania) (European Commission. Standard Eurobarometer, 2021). The creative potentials of the new information and communication environment appear to be a key factor in the development of the Bulgarian media reality. More than 76% of the Bulgarians use Facebook for any purpose and 64% for news; 70%/64% - YouTube; 54%/17% - Facebook Messenger; 61%/16% - Viber; 36%/12% Instagram; and 13%/8% - Twitter. 38% share news via social media, messaging or e-mail (Reuters Institute Digital News Report 2021).

### 1.3. Assessment of monitoring capabilities

In the considered 20-year period, the media research interest in the country has been focused primarily on the challenges of the processes of digitalization and the introduction of new technologies in various aspects of the media field: legislative and regulatory; journalistic; media usage patterns; media related competences, extensively analyzed in a number of academic research publications.

Emphasizing on the state-of-the-art of the existing research in the country with regard to risks and opportunities for deliberative communication, a large array of specialized publications has been identified and examined. This includes predominantly findings of transnational organizations that monitor media systems globally; datasets of national statistics and public bodies; legislative, policy and regulatory documents; institutional official papers and non-government reports; academic national and international research; major sociological surveys; research of non-governmental organizations; publications of professional associations media, etc., using keywords related to the four domains. Large comparative research projects that collect periodically data and produce comparative analysis over certain periods are relatively scarce and inconsistent, as well as thorough commentaries of the media industry.

In particular, legal framework, regulatory practices and civil ethical initiatives are comparatively comprehensively studied at national and international level. Despite the publications related to the topic data about the Bulgarian media regulation have been also collected through other European projects and questionnaires submitted by the national ministries to the CoE, EC, OSCE, UNESCO or ITU. In the research international principles and aspects of freedom of expression and freedom of access to information as well as the acceptable limits of these fundamental rights dominate.

The resulting changes in the nature of the journalistic profession, the role of the media and journalists in the digitalized socio-economic conditions are also comparatively well researched. Regarding the quality of the media content, the following main characteristics have been studied, although sporadically: timeliness of the news programs; public significance of the broadcast information; factual accuracy based on verification by independent sources of information; objectivity – disclose of all facts in an unbiased way; presentation of plural points of view on the topic; publication of in-depth journalistic works on socially significant topics (investigations, reports, analyzes, comments); writing and spelling style; etc. Along with the many benefits and positive effects of the new media ecosystem, increasing trends to misinformation, manipulation and hate speech have also been examined.

The media usage patterns is studied in light of several factors such as access to media content, media diversity, functionality and quality of the media, public trust in the media, new media, etc. The most common research is related to public trust in the media and frequency of media consumption, broken down by different age groups, as well as divided into social and ethnic principles. The type of media preferences (TV, radio, print, internet, websites, social networks, social media) have been also studied, as well as variety of issues, regarding media consumption and quality of news content.

Research on media-related competencies is rather sporadic. Specific interest especially on media literacy issues has been growing lately, mainly due to the efforts of non-governmental organizations and academia.

Following the aim of this case study report to identify critical junctures in the media transformation process (2000–2020) by investigating different risks and opportunities in this context, such deficiencies need to be taken into account, interviews with national experts in the domains of media law, regulation, and ethics, journalism, media usage, and media literacy have been conducted in order to supplement the findings in the selected sources:<sup>3</sup>

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<sup>3</sup> Methodologically, the open-ended interviews were organized with the help of a semi-structured interview guide, intending to identify major transformations of the Bulgarian media system in the past 20 years. Altogether, 17 interviews with experts from academia, media industry and other institutions were conducted between June and November 2022. Participating experts included (in alphabetical order): Dr. Vesislava Antonova (longtime journalist, editor-in-chief of “Manager” journal), Prof. Dr. Danail Danov (Sofia University, Program director at Media Development Center Member of the Media Literacy Coalition), Assoc. Prof. Dr. Svetlozar Kirilov (Chair of Theory and History of Journalism Department at the Faculty of Journalism and Mass

This case study provides analysis of some of the critical junctures in the Bulgarian media ecosystem developments, based on the research of major sources and datasets on media and journalism in the country (2000-2021) in four domains (legal and ethical regulation, journalism, media usage patterns, and media related competences, important for sustaining democracy in the country. According to expert Simeon Vassilev though “media and society are interdependent, the development of the media cannot be separated from the state of society. The media must be a factor in the development and democratic foundations of Bulgarian society, but they must not impose or replace the public agenda”.

In the field of legal and ethical regulation the most significant challenges relate to: media regulation, freedom of expression and freedom of journalists, media legislation, transposition of the European regulation, media self-regulation and accountability, COVID and legislative initiatives against disinformation, and digitiation. In the context of journalism the focus is put on media pluralism, media ownership and media concentration, political and corporate influence on the media, and journalism profession – labour market and working conditions, realization of the graduates. The examination of risks and opportunities for media usage patterns is connected with lack of consistency and cyclicity of research, public trust in media, and media consumption by different age groups. With regard to media-related competencies such issues as early training to increase media and digital literacy, media literacy and fake news, media competences and media “diet”, media literacy and media pluralism are discussed. The findings may be used for comparative analysis of the critical junctures in the four domains.

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Communication, Sofia University), Prof. Dr. Lulivera Krasteva (Sofia University, longtime press journalist and media expert), Assoc. Prof. Georgi Lozanov (Sofia University, former chairman of the Council for Electronic Media (CEM) – the broadcasting regulator), Dr. Valery Marinov (Bulgarian National Television (BNT), the public service broadcaster), Prof. DSc Ivanka Mavrodieva (Sofia University, Chair of the Institute of Rhetoric and Communications, Editor-in-chief of the electronic scientific journal “Rhetoric and Communications”), Prof. DSc Raina Nikolova (New Bulgarian University, former member of the Council for Electronic Media (CEM) – the broadcasting regulator, former administrative director of the Bulgarian National Television (BNT) – the public service broadcaster), Prof. Dr. Nikolay Mihailov (Sofia University), Prof. Dr. Margarita Pesheva (former chairman of the Council for Electronic Media (CEM) – the broadcasting regulator); Ivan Takev (longtime journalist, former member of the Management board of the Bulgarian National Television (BNT) – the public service broadcaster and currently – ombudsman at BNT), Evgeniy Todorov (founder of the Plovdiv public TV and longtime journalist), Prof. Dr. Petko Todorov (longtime journalist and media expert, founder of 4 local TV stations), Snezhana Todorova (President of the Union of Bulgarian Journalists), Prof. Dr. Valeriy Todorov (University of Library Studies and Information Technologies, longtime journalist and foreign correspondent and former General Director of the Bulgarian National Radio (BNR) – the public service broadcaster, President of the “Culture and Communication” Foundation, owner of [www.obache.bg](http://www.obache.bg)), Assoc. Prof. Dr. Simeon Vassilev (Sofia University, longtime journalist, foreign correspondent and former Director of the News Program at the Bulgarian National Television (BNT) – the public service broadcaster), and Dr. Bissera Zankova - President of the “Media 21” Foundation and media consultant at the Ministry of Transport IT and Communications for media and information society activities of the Council of Europe).

## 2. Risks and opportunities of legal and ethical regulation domain

### 2.1. Development and agency of change

The examined publications cover the entire time period of the study and can be divided into four main groups: national and international academic books and articles; legislation acts; national consultations on legal issues; ECtHR and other court cases. The combination of these sources gives a relatively good picture of the legal and ethical regulation in Bulgaria and the topics discussed.

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During the years of transition when the Constitutional Court was very influential through its decisions supporting the building of the new democratic institutions its practice particularly in the media field was widely debated (e.g. Decision № 7 of 1996 on c.c. № 1 of 1996 in which the Constitutional Court interprets the constitutional provisions relating to freedom of speech (art. 39), freedom of the media (art. 40) and the right to information (art. 41), justifying self-regulation (lack of a special law) for the print media and regulation for the electronic media - radio and television. The decision provides guidance in line with the European theory and practice on the legal framework of the future media law, which will regulate two of the main elements of the media system - radio and television, respectively - as well as the types of radio and television organizations). Gradually the mass media interest in the Constitutional Court and the ECtHR jurisprudence decreased. Now the interest in the constitutional case law and tradition (domestic and foreign) is still high in the academic circles and legal profession. The same observation is valid about the caselaw of high courts.

Human rights together with the right to free expression and access to information occupy a prominent place in the Bulgarian Constitution and follow the model and expression of the European Convention on Human Rights (ECtHR), which made possible Bulgaria's accession to the Convention and membership in the Council of Europe (in 1992). However, these initial promising steps after the democratic changes in the 90s deteriorated in the following years and the existence of constitutional provisions could not stop malpractices in the media environment – commercialization, tabloidization, clientelism, deprofessionalization. Court decisions are quoted in special journalistic materials on relevant matters but not very often. The media law culture is not high and often journalists take a hostile stand against legal decisions when they do not follow a particular line. The media are not neutral in their comments towards the Constitutional Court decisions but often express party lines which is a proof for their strong politicization and that they do not mediate the debate but become a political participant in this debate – a fact which is very worrying.

The media system in Bulgaria developed in parallel to the political system, considered by some scholars as a 'secondary' or 'parallel', artificially constructed, world which mimics real reforms (Minev, Kabakchieva, 1996).

On a larger scale, making a comparative assessment of the level and quality of democracy in post communist countries, democracy in Bulgaria is categorised by researchers as an elite democracy or semi-consolidated democracy, that is one with competing oligarchies and a low level of political participation from citizens. Bulgaria can also be characterised as 'partitocrazia', this means that public life, and the whole public sphere, are monopolised by political parties



which compete among themselves supported by economic pressure groups. The country belongs to the politicized media model where there exists political pluralism and the media are partially free (Dobek-Ostrowska, 2015).

Political majorities decide about the adoption of media legislation according to their interests. The result of this political capture is that the Bulgarian broadcasting acts were implemented much later than in other Central and Eastern European countries allowing for deregulation of the media market. Then such perilous proximity between the media and politicians affected the content of the laws which reflected predominantly the interests of the political groups and not the general good.

This led to “a general drive for liberalisation and less regulation, considered to be the proper way for the realisation of the values of freedom of expression and access to information, crucial for building democratic society” (Smilova et al 2011).

The lack of systematic upgrading of media regulation is tangible and the pursuit of rapid privatization in this area has prevailed over the public interest. These shortcomings of the media environment and the delayed regulatory framework also affect media research, which has dealt with particular issues for a long time while comprehensive multidisciplinary studies have been rare.

The deficits of the Bulgarian media regulation persist until now. Censorship is forbidden but “self-censorship and self-restrictions that journalists impose on themselves in their daily work have become an alarming, unwritten norm. And in emergencies and periods of uncertainty they become even more visible”. According to the study “Journalism without Masks” carried out by the Association of European Journalists - Bulgaria (AEJ-Bulgaria) and Alpha Research Sociological Agency, a serious increase in the culture of pressure is noted in 2020. The most perilous is the political pressure on media which has not diminished but is “relatively twice as large as other centers of influence on media content - economic entities, advertisers, state and municipal institutions.” The survey provides alarming descriptions of cases of self-imposed restrictions and the frequent repetition of the word “fear” (dismissal, pay cuts, prosecution, physical security) which is a worrying signal about the real situation of Bulgarian journalism. Journalists either have to liaise with the political class or economic groups or be uncertain about their job. The “bureaucratic journalism phenomenon” according to the authors is a disturbing consequence of the politicization and commercialization of Bulgarian media depriving journalistic profession of its potential for criticism and creativity. At the same time “even if it doesn't happen regularly, almost every journalist has stopped their publication or report under the self-censorship pressure (47%) the results of the survey show. 6.4% of the respondents say it's a regular practice”. These figures serve as evidence that the media environment is far from being enabling for journalists and especially for freedom of expression. These inferences also serve as a proof that the law does not create and sustain the necessary legal guarantees for the independence of the media and journalists (Valkov, 2020).

## 2.2. Freedom of expression

The Recommendation of the Council of Europe on the protection of journalism and safety of journalists and other media actors provides that “enabling environment for freedom of expression has a number of essential features which collectively create the conditions in which freedom of expression and information and vigorous public debate can thrive. The right to receive information embraces a right of access to information. The public has a right to receive information and ideas of public interest, which journalists and other media actors have the task of imparting. The gathering of information is an essential preparatory step in journalism and an inherent, protected part of press freedom. The participation of journalists and other media

actors in public debate on matters of legitimate public concern must not be discouraged, for example by measures that make access to information more cumbersome or by arbitrary restrictions, which may become a form of indirect censorship” (Council of Europe, 2016).

One of the major issues here is how far freedom of expression may go or what its limits are.

The discussion about libel and defamation and the respective sanctions gains momentum in different periods of the development of the Bulgarian media system. In 2000–2007 there was an intense exchange of opinions on that issue. Nowadays the topic is again on public agenda. Art. 146, 147 and 148 of the Criminal Code provide for criminal sanctions in cases of insult and defamation. According to the Decision N 20 from 1998 of the Constitutional Court of Republic of Bulgaria criminal liability is one of the legal guarantees for the protection of the dignity of human personality. Therefore civil or criminal liability for libel and defamation both assure protection of honour, good name and dignity of persons and comprise an acceptable constitutional limitation of the right to free expression. Criminal liability in this respect is not a foul to the constitutional order. Some European states have decriminalized libel and defamation upon the appeal of and with the assistance of the Council of Europe experts but other countries including Bulgaria still regulate libel and defamation as a criminal act. There are states that envisage imprisonment for libel and defamation but Bulgaria is not among them. Fines are usually imposed in cases of insult and defamation and some years ago they were in symbolic amounts. However, nowadays courts may impose a disproportionately high amount of fines (compared to journalistic salaries). Other offences under the Criminal Code that can be similarly sanctioned comprise disclosure of another person’s secret, use of information with a criminal intention and use of information from the Ministry of the Interior archives with a criminal purpose.

Despite the protection under the Criminal Code damages for a wrong doing including those caused by libel and defamation could be also pursued in a civil procedure (art. 45 of the Obligations and Contracts Act) but the process can prove to be more expensive than under criminal legislation. The idea behind such approach is that criminal liability can be used to guarantee the honour and reputation of affected persons on a universal basis since the right of reply is not regulated in the print and online media in Bulgaria. Recently insulting or defaming someone through social networks has become a major issue. There are decisions of district courts against the perpetrators that used FB for that and the courts premise their arguments not only on the subjective perception of the victim but also on the violation of widely shared moral and public principles of social communication. With respect to the defense in defamation cases acting in good faith is crucial for journalists. The court practice is thoroughly based on this principle. However, court practice alone cannot improve the communication environment radically, without the powerful voice of the civil society and journalistic community. Emphasis should be also put on media literacy, self-regulation, and media accountability mechanisms which can make the media strong and influential. In this last respect the media in Bulgaria are very much disunited.

Recently a bill for the amendment of the Criminal Code in the section related to insult and slander has been proposed. The goal is to put national legislation in conformity with the requirements of the ECtHR pending a number of convictions issued by the Court and establishing violations of freedom of expression under Art. 10 of the Convention for the Protection of Human Rights and Fundamental Freedoms of the Council of Europe in light of the caselaw of the ECtHR. On many occasions the Court has explicitly emphasized the importance of disseminating information on issues of public concern. The analysis of the convictions handed down against Bulgaria shows that with regard to the legal institutions of insult and slander current Bulgarian legislation does not meet the conditions of the Convention and the jurisprudence of the ECtHR. In the explanation note of the Ministry of the Judiciary the cases of

*Bozhkov v. Bulgaria* (complaint № 3316/04) and *Kasabova v. Bulgaria* (complaint № 22385/03) and decisions from 2011 r. are explicitly mentioned. Other cases are *Marinova v. Bulgaria* and *Stanev N 2 v. Bulgaria*. The sentences in these cases violate the principle that free and open public debate demands higher criticism of public figure and public officials.

The new amendments provide for release from criminal liability and imposition of administrative sanctions in some cases when the object of insult and slander is a public authority; abolition of the minimum amount of fines since they are too high for the economic situation in Bulgaria and their disproportionate effect should be removed; the amendments will related to any traditional and new medium including Internet sites, blogs, social networks, etc.; the aggravated cases of art. 148 para 1 p. 3 about slander will be removed and Bulgarian practice will be harmonized with that of the ECtHR and the principle that public officials can be an object of higher criticism in connection with the discharge of their public function will be put in force. These changes will facilitate the activities of the media and journalists in particular and improve the media environment in general. The strong position of the media community and the public can be crucial in this respect.

Related to the problem of insult and slander is the right of reply which in Bulgaria is comprehensively legislatively regulated for broadcasting media only (RTA). In its Decision 7 /1996 in which the three constitutional provisions concerning freedom of expression of opinion, freedom of the press and any medium and access to information are interpreted by the Constitutional Court judges stress the necessity of legally binding right of reply procedure for any mass communication medium. Such obligation should exist and operate in parallel to the court proceedings in cases of libel and defamation. The Radio and Television Act provides also for the obligation of public apology for the media service providers if the rights of the audience are impaired. The right of reply is mandatory for the media that have signed the Ethical Code of Bulgarian Media. However, the press and online media that have not signed the code should also abide by such rule. Apparently only a new legal instrument related to the right of reply in all mass communications media can regulate properly the situation. A universal right of reply can also strengthen media accountability and media self-regulation in general. However, support for strengthening the right of reply in journalistic work comes from lawyers and not from journalists themselves which means that on that matter they liaise with the media owners and their interests and not with the public interest.

The protection of the confidentiality of journalistic sources is not comprehensively regulated under the Bulgarian legislation. What is most worrying is that there are no express procedural guarantees for the implementation of this right. However, the courts consider it an unalienable part of the right to free expression and take into account the international documents – the recommendations of the Council of Europe, the caselaw of the ECtHR and the Directive (EU) 2016/943 on the protection of undisclosed know-how and business information (trade secret) against their unlawful acquisition, use and disclosure (transposed into the national legislation through the Trade Secret Protection Act from 2019 and which art. 2. (1) provides that the law shall not apply to: 1. the right to freedom of expression and the right to information under the Charter of Fundamental Rights of the EU, including respect for freedom and pluralism of the media to guarantee the freedom of media and journalistic work) when deals with such issues. The court practice is fully in favour of journalists and their right to keep the secret of their sources. In this respect therefore it is in compliance with the requirements of the international law. Regarding journalists and media workers in the audiovisual media the Radio and Television Act provides explicitly for the protection of the confidentiality of journalistic sources and media service providers are not obliged to disclose these sources (art.15 para 1). The principle is also endorsed in the Access to Public Information Act (APIA).

## 2.3. Freedom of information

The law on access to public information (APIA) passed in 2000 can be considered very effective and the court has established a long-standing practice of giving access to documents not only to journalists but also to every citizen. Access in this respect is expanding. A special platform for access to public information has been created and is maintained by the administration of the Council of Ministers according to art. 15c, para. 1 of APIA. It is a unified, central, public web-based information system that facilitates electronically the entire process of submitting and reviewing an application for access to information, forwarding to the competent body if necessary, providing a decision and publishing relevant information by the subjects required by the Access to Public Information Act in compliance with the protection of personal data under the Personal Data Protection Act. Statistical information on applications for access to public information is regularly published.

Since 1997, the non-governmental organization Access to Information Program (AIP) has been collecting, consulting and systematizing cases of denial of access to information throughout the country through a correspondent network of journalists. This is an example of efficient collaboration between the media and the third sector. Until the adoption of the law in 2000 there were 800 cases, then their number decreased over the years (up to 10–20 cases per year due to the improving practice (Access to Information Programme).

Thanks to the legal assistance and representation in court and advocacy citizens, journalists, NGOs and businesses receive access to thousands of documents, exercising their fundamental right of access to information. With the efforts of AIP the first in Bulgaria review of classified documents and declassification of many of closed cases has been achieved. The organization managed to support successfully access to the documents of the former State Security, which were used by journalist Hristo Hristov to write such bestsellers as “Kill the Wanderer”, “The Double Life of Agent Piccadilly”, etc. revealing documents’ proven details about the murder of the Bulgarian dissident and writer Georgi Markov in the seventies of the 20<sup>th</sup> century. With the assistance of AIP the publishing of transcripts of government meetings and government contracts with private companies on the Internet began – all positive steps supporting media work and investigative journalism ((Kashumov, 2004).

The struggle against hate speech and discriminatory pronouncements is based on the practice of the Commission for the Protection of Discrimination (CPD) which should be followed also by the Commission of Media Ethics. However, case decisions in the area of ethnic discrimination between these two bodies are not always in harmony with one another. Sometimes there are complaints against the way in which the media cover events in which participants are of Roma ethnic origin. When the publications in the media are of a character that forms a negative public opinion towards the Roma community, this constitutes harassment within the meaning of the Law on the Protection against Discrimination since there is a danger for inciting hatred and ethnic tension. A principle in criminal and administrative criminal law is that the responsibility for the act is personal and does not belong to the whole community. Serious flaws in the media coverage of immigrants and refugees and Roma persons’ behavior which is often negative and does not foster intercultural dialogue are witnessed. In this respect the practice of CPD, which has established standards on what is hate speech and how it constitutes discrimination in the form of harassment is rooted in human rights’ recommendations of the Council of Europe and is quite useful for the creation of enabling media environment. Decision № 178/2008 and Decision № 263/23.12.2008 of CPD impose mandatory prescriptions on the media, including the obligation to develop self-controlling methods and mechanisms for taking specific measures to refrain from indicating the ethnicity of persons, if this is not essential for the purpose of the information, as well as for refraining from reporting information on incidents involving individuals of Roma origin in a way that connects individuals with the Roma community as a

whole. The practice of the CPD establishes the standard that negative stereotyping and aggressive representation of the Roma community as a whole, as well as the identification of persons of the Bulgarian ethnic group as victims of the conduct of the Roma community as a whole, constitutes harassment on ethnic grounds (Zankova, Kirilov 2014). The non-professional attitude of the media in some situations of ethnic tension is disappointing. Most of the cases at the media ethics commission are about discrimination and how journalists should write their materials and title them which means that path towards higher professionalism continues. In some cases Roma organizations submit requests to the CPD and the body refers to the ethical rules. Responsible journalism is present when journalists act in good faith, collect and disseminate information in accordance with journalistic ethical norms exercising profession and respect other human rights.

On November 16, 2021, the Supreme Administrative Court (SAC) ruled in a case of the Commission for Personal Data Protection (CPDP) against an electronic media, filed in connection with the publication of personal data of an individual for the purposes of journalistic material. The SAC's decision is particularly valuable in that it formulates criteria for assessing the balance between two competing rights - the right to freedom of expression and information and the right to protection of personal data being part of the right to privacy, as both are not absolute.

In 2019, the Constitutional Court (CC) repealed art.25h of the Personal Data Protection Act (PDPA) which had introduced 10 criteria for assessing the balance between freedom of expression and the right to information and the right to protection of personal data. Bulgaria was unique among EU member states in this respect. There was no requirement for journalists to follow all the criteria at the same time but only those relevant to each case. This represented an attempt of the legislator to introduce conditions for the use of personal data for journalistic purposes, which journalists should comply with in their publications in order for not to infringe the General Data Protection Regulation (GDPR). However, media and journalists in Bulgaria discerned a new censorship in this. And such conclusion was hasty and based on poor understanding of the logic of legal acts and protested.

The Constitutional Court intervention factually gave priority to the case law of courts which could evaluate the media conduct in every single case and provide recommendations. The SAC decision from 2021 sets a precedent that must be carefully considered by the media in Bulgaria. There for the first time SAC explained how the assessment should be made in each specific case of which data is admissible to be published for the purposes of journalistic publications. The court's decision clarifies the meaning of the restriction, which imposes the principle of "minimum data". Only necessary and sufficient personal data should be published for the purposes of investigative journalism and other journalistic pursuits so that the requirements of freedom of expression and information in a democracy can be satisfied. Disproportionate interference with the privacy of individuals, derived from the right to protection of personal data, must not be allowed. Consent is an important element in the process of publishing information about a particular person. GDPR is a complex legal instrument that demands more efforts for understanding it – from the media and the public as well. Legal culture will become more and more needed for the journalistic community for its activities.

## 2.4. Accountability system

### 2.4.1. Development and agency of change

The Radio and Television Act (RTA) is not the only law related to the media, but as a special law it can be considered central for the media system though a number of other laws also relate to the regulation of the work of the media organizations in Bulgaria. General laws regarding all

media are the Commercial Law, the Criminal Code, the Copyright and Related Rights Act, the Competition Act, the Health Act, the Consumer Protection Act, the Child Protection Act, etc. With respect to the broadcasting sector leading is the role of the two special laws - the Radio and Television Act, which regulates the broadcasting of audiovisual content, and the Electronic Communications Act, which regulates the provision of electronic communications which are carried out by transmitting, transferring, and broadcasting by wire, radio waves, optical or other electromagnetic options.

Another important legal piece which was passed after long discussions was the Law on Access to Public information (SG, N55 2000, amended until 2019). The law regulates matter related to the right of access to public information, as well as the re-use of information from the public sector. This law is indispensable to the work of the media and journalists and constitutes the foundation of open and free public debate and transparent governance. Constitutional protection of the media system is in place and the caselaw is to a great extent in harmony with the European norms. The same is relevant for the administrative practice of bodies like CPD and CPPD and examples of laws' application have already been discussed.

After the democratic changes, the debate on the future of the Bulgarian media system covered jointly the print and electronic media but gradually newspapers and periodicals remained outside the scope of a possible special legal regulation. One of the reasons was the decision of the Constitutional Court from 1996 which, interpreting the constitutional provisions on freedom of expression and freedom of the press and laying the principles of the future media system in Bulgaria, determined that the audiovisual sector will be regulated by law while the print sector will be left to the impact of self-regulation. However, such approach was also in tune with the understanding of the journalistic community. "One of the taboos of the Bulgarian media legislation that emerged after 1990 was that a press law could not be passed in Bulgaria because it was accepted and is still accepted that such law is in principle restrictive" (Cholakov, 2004).

The problem with a special press law actually was discussed in the 1990s, today the tendency is that general laws concerning freedom of speech and freedom of information should be applied also to the media and journalists - a conclusion made without in-depth examination of the national market and comparison with other legal systems. "Being only recently emancipated from the burden of official state censorship, the press became an easy prey in complicated maneuvers of political gamesmanship. As far as the press is concerned, its status had to be defended many a time, with opinions varying from the need for press legislation, to complete self-regulation and currently, towards new demands for greater state and legislative control equally in matters of print and broadcast media" (Georgieva-Stankova, 2011). Despite discussions, still there is no consensus in Bulgarian society and among media professionals above all about passing a special press law. Legal instruments have never been considered as providing guarantees for the right to free expression but as burdensome restrictions. Such overall piece of legislation balancing regulation and self-regulation and encompassing all types of media including electronic platforms could be elaborated once the DSA/DMA package of the EU regulating the media in the digital environment comes in force hopefully in 2023. Such act can also provide for a universal right of reply and the necessary procedure. The issues are of utmost importance for the media impact but are absent from journalistic agenda including the European Freedom of Expression Act.

Based on the EC guidelines for the transposition of AVMSD in domestic legislation, self-regulation is particularly encouraged nowadays in the electronic media field through codes of conduct developed by media service providers and service providers on video-sharing platforms in cooperation with other sectors, such as industry, trade, professional and consumer associations or organizations. So far in Bulgaria there are scarce practices developed under the

new provision. One of the goals of AVMSD is to boost co-regulation as well. It should be emphasized that not only the RTA is important for expanding self- and co-regulation, but also other laws that may have a bearing on these types of regulation. For example, in 2003 the Law on the Restriction of Administrative Regulation and Administrative Control over Economic Activity (LRARACEA) was adopted (SG, N55 from 2003, amended until 2021), the aim of which was to facilitate and encourage the economic activity by keeping within socially justified limits the administrative regulation and administrative control carried out by the state and local bodies. In 2004 an attempt was made to supplement the law with provisions which stipulate for the delegation of competences of administrative control to professional organizations. The proposed deconcentration of administrative power would affect the management of the registration regimes only. The amendment however, did not take place and the bill was put aside. Thus, the opportunity to test the setting of controlling functions on professional organizations in different sectors including the media one failed as well as to apply procedures for strengthening self-regulation and co-regulation, which would be a valuable experience and could be used as a basis for the implementation of the requirements of the AVMSD. That initiative was not supported by the journalistic community and there are not discussions about such legislation that will raise the stature of the media professional organizations now as well. So far there are no examples of co-regulation applied in the field of media. Self-regulation is also very meagre. Proposals about self- and co-regulation do not come from the professional community and that community cannot benefit from instruments that stay closely to the regulated. In fact the Bulgarian journalists and the media want to be above any type of regulation.

#### *2.4.2. Existing media accountability instruments and an evaluation of their effectiveness*

During the transition to a pluralist democratic media system, the establishment of effective self-regulation was one of the key goals in Bulgaria – even though an arbitration commission has been in operation at the Union of Bulgarian Journalists (UBJ). The associations of media owners and publishers have always exercised considerable influence on the media legislative process to create the first Radio and Broadcasting Act in 1998 and later on the ensuing Code of Media Ethics in 2004. With regard to the content of the code, there was disagreement and dispute among the groups and organizations from the outset. In the initial stage, at least seven different drafts were put forward and none of them were accepted unanimously. The Code of Media Ethics was drafted within the framework of the PHARE project ‘Technical Support for Improving the Professional Standards for Bulgarian Journalism’. New disagreements between the associations of media owners, resulting in changes in the structure of the Council for Media Ethics, led to the interruption of the functioning of the two initial Commissions (one for the press and another for the broadcasting media) in 2012–2013. The debates within the NCJE and with media experts and professionals, facilitated their merging from 2015 on to form a single ethical Commission consisting of twelve members with scope to cover all types of media (including online). So far media self-regulation has not accomplished great results for the improvement of media content and the media environment at large. In contrast to Western individualistic societies, collectivistic societies such as Bulgaria and other countries in Central and Eastern Europe, because of their slower pace of modernization and agrarian past, build morality systems characterized by particularistic virtues, low levels of trust and double moral standards (Hofstede et al, 2010). Despite this socio-cultural prerequisite it can be said that „the inadequate regulatory framework, the lack of transparency of media ownership, the close ties between the media, business and politicians, alongside the lack of dialogue between stakeholders, are among the main challenges for developing a sound system of media accountability” (Zankova, Glowacki, 2019). To these reasons for the not-effective accountability system it can also be added the weak civil society, the passive public and the dispersed and negligent journalists' community which does not unite around the cause of modern and effective media accountability. Another complication is that in the digital age the system of

media accountability has to be upgraded in order to interact more thoroughly with individuals and audiences. The independence of the media and their professionalism and moral integrity are essential objectives that can be achieved through the establishment of accountability mechanisms that suit the demands of the new media environment. This is a desirable goal in Bulgaria but still hard to accomplish. The debate on the issue is missing.

The Bulgarian media associations also missed the opportunity to deepen the discussion on the regulation of the journalistic profession, which could guarantee its status as self-governing through a professional organization established by law. So far, there is only one article with specific legislative proposals on the topic (Dimitrov, 2019).

Indeed, the Council for electronic media (CEM) supports a section in its website for questions and complaints from the audiences, which it uses in its communication with the media service providers and in the organization of public discussions on media issues. Only the two public service media – the Bulgarian national radio (BNR) and the Bulgarian national television (BNT) – sustain an office of the institution of ombudsman. The activities of these offices are reflected in special programs of both PSB. Expert Ivan Takev, the ombudsman at BNT, says that “The political elites do not give up on “manipulating” the “manipulators” (the “telecracy”, according to the Umberto Eco’s definition. They just changed their strategy to keep them as a management tool. But as guilty as the elites are, no less guilty are the very journalists and the professional guilds that were inside the besieged tower”.

### 3. Risks and opportunities of journalism domain

#### 3.1. Development and agency of change

The transposition of the European regulation is a matter of great concern in Bulgaria. Apart from its mechanistic incorporation into domestic acts, European acts are not sufficiently applied according to the spirit of the European principles. The requirements for proportionality are not observed consistently when imposing criminal and administrative penalties and coercive administrative measures. This approach was also vivid during the imposition of huge fines on Economedia, the publishing company of the business newspapers “Capital” and “Dnevnik, and on the provincial newspaper and websites “ZovNews” (<http://vratzanews.com>, <http://www.vecherni-novini.bg>, <http://zovsport.com>) as well as on the electronic site of the newspaper (<http://zovnews.com>, subsequently canceled permanently by FSC) in 2015 according to the then Law on Market Abuse of Financial Instruments by the chairman of the Financial Supervision Commission (FSC). The rationale for the sanctions was that during the banking crisis in the summer of 2014, when one of the big Bulgarian banks - the Corporate and Commercial Bank (CCB) – was on the brink of going bust and placed under special supervision in 2015 (CCB was declared bankrupt in 2015 with the starting date of its insolvency 6 November, 2014), the cited media outlets published articles about the financial state of another big bank in the country – First Investment Bank (FIB) and thus supposedly generated ungrounded tension and insecurity among the public. In fact, the objectives of the law transposing the European directive were quite different and related to the protection of the market and market instruments, but the easiest target was apparently the media and journalists who were obliged to inform the publics in any situation and the fines aimed at harassing them and forcing to disclose their sources of information. The case is a classic example of the chilling effect of a purposefully wrong interpretation and implementation of the law the application of which may have repercussions on freedom of the media.

In modern society the role of speech and communication is ubiquitous and any law that may affect the media and freedom of expression must be interpreted when applied giving priority to



the protection of freedom of expression (in line with the case law of the ECtHR). Any modern law has to some extent a direct or an indirect connection with freedom of expression, and as soon as it is established, the possible risks to this fundamental right (and other related rights) must be carefully considered when formulating specific provisions.

Another conspicuous deficiency is that The Radio and Television Act (RTA) and the Protection of Competition Act do not contain explicit norms regarding transparency of media property and concentration. There has never been coordination in the implementation of these two laws or a comprehensive administrative system of rules in force that can contain media concentration and cross ownership within acceptable limits as required by the European documents. Some issues important to media pluralism, such as the level of media ownership and concentration, including cross-ownership have not ever been addressed in the RTA. The risks of political interference, mainly with regard to public service media and the independence of the media regulator, are on-going. On the other hand, business interests from various sectors threaten the private media. Only in 2018 the media mogul Delyan Peevski (owner of the New Bulgarian Media Group deemed close to the Turkish-minority Movement for Rights and Liberties party and sanctioned for corruption by the US Department under Magnitsky Human Rights Accountability Act in 2021) initiated amendments to the Law on the Mandatory Deposit of Printed and Other Works and on Announcing Distributors and Providers of Media Services (SG, N 108 2000, amended until 2019) in order to increase transparency of ownership and financing of various media service providers if violated and though a special registry has been set up at the Ministry of Culture it has more a decorative but not a substantial role. In addition, media ownership especially in the print media sector though generally referred to in debates turned out to be one of the topics taboo for the Bulgarian media according to a study done in 2014 (Indjov, 2014). This proves the passiveness of media professionals and their willingness to have this problem solved without much dedication on their part. On the other hand, media moguls successfully manipulated public opinion with the proposal of non-workable laws.

The review of the existing research on the media environment in Bulgaria (2000-2021) draws attention to several critical junctures for Bulgarian journalism. Most of them are related to media pluralism in its various aspects - diversity of content and opinions, transparency of media ownership, political and financial (in)dependence of the media, social exclusion of groups from society, etc. The state of the journalistic profession in the market and working conditions, education and realization of students in journalism, and journalistic values and standards, reveal additional risks for the development of journalism in the country.

### 3.2. Market conditions

Disclosure of media ownership in Bulgaria has been on the public agenda since the beginning of the new century. Non-transparent media ownership allows for non-transparent funding and for turning the media into instruments of power. The impression is that the media is controlled not by the specialized regulators, but by the economic and political interests of the owners and, above all, by the anonymous backstage behind them (DW Bulgaria, 2015). The results are the inability of the media to perform their essential functions in the service of society, low audience trust and lower level in the rankings for freedom of speech (Reportares without Borders Annual Rankings).

For ten years (during the first decade of 21<sup>st</sup> century) Krassimir Gergov hid his property in one of the most influential commercial Bulgarian television bTV, licensed for national distribution. During this time, being the owner of the largest advertising agency in the country, he was in an obvious conflict of interest, as Bulgarian law did not allow combining advertising and media activities by one and the same person/company. With legislative changes in 2010, Gergov's ownership in bTV was legalized and brought to light. However, the question remains whether

lawmaking in Bulgaria serves the public interest or is carried out in the service of rich and privileged Bulgarians. After this case, the unclear ownership of the influential media in Bulgaria became a tradition.

In the second decade of the 21st century, the focus of attention of journalists and researchers was the media empire of Delyan Peevski. In just a few years, the businessman and MP from the ethnic party of the Turkish minority in Bulgaria (Movement for Rights and Freedoms - MRF) acquired 10 newspapers, 9 online publications, 4 TV channels (one of them – TV7 – received a license for national distribution), 4 radio stations, and 4 magazines. As an MP, Peevski was also in an obvious conflict of interest and stubbornly denied being a media and corporate owner. The origin of Peevski's finances also raised many questions. The media with which his name were associated were extremely helpful to the ruling political party in the last decade and were often called “media bats of power” (Antonova, 2015), used to defeat critics of the status quo and any potential opposition in its infancy. This is the reason why the calls for public announcement of media property in Bulgaria have remained unanswered by the government for more than a decade. Later he sold all of his media property.

Another media mogul is the Bulgarian entrepreneur Ivo Prokopiev. He is a co-owner of the media group "Economedia" AD, which publishes the weekly newspaper “Capital” and supports the news site “Dnevnik”. Economedia AD is a publishing group for business media, founded in 1993. The media group owns more than ten media.

The scenario is repeated in the last three years, when the most influential media in Bulgaria changed their ownership. Through a series of horizontal and vertical mergers, three main media groups have been formed in the country. To the issue of transparency of ownership of media companies is added the problem of media concentration and the resulting negative consequences for the market and media environment in Bulgaria.

In 2020, the Amsterdam-based United Group became the owner of the oldest telecommunications company in Bulgaria - Vivacom, which also owns the networks for the distribution of radio and television signals in the country. It acquired the most influential television group - Nova Broadcasting Group. Its portfolio includes the TV channels with the largest market and audience influence in the last decade, three radio stations and the online group NetInfo, which is considered to be the leader in Internet advertising and owns the only Bulgarian video sharing platform VBox7 (Arnaudov, 2020).

The national mobile operator Telenor Bulgaria changed its ownership in 2018, when it became the property of the Czech PPF Group. The investor also bought the assets of the American CME in Central and Eastern Europe and acquired the other influential media group in Bulgaria - bTV Mdia Group (6 TV channels, 5 radio stations, 3 websites, and two online platforms).

In 2015, the leading telecommunications operator Mobiltel (now A1 Bulgaria) bought the largest cable operator in the country - Blizoo. Within two years, the company launched its own TV channels and in 2019 climbed the second place in the pay TV and Internet supply. The company relies on the development of sports channels and the purchase of rights to broadcast major sporting events (Arnaudov, 2019).

Thus, at the end of the second decade of the 21st century, in Bulgaria is witnessed an unprecedented merger of telecommunications, media and online industries

At this stage, this raises more concerns than opportunities for the development of the media sector. The concentration of media ownership in corporate hands is considered to be a serious obstacle to media pluralism and media freedom. One of the main effects of media concentration is the commercialization of content. According to the Council of Europe, commercialization limits the diversity of programs created, as well as those related to minorities, alternative cul-

tures and subcultures. There is a declining willingness to cover the costs of public broadcasters, which are already under pressure from commercialization.

The Bulgarian media are exposed to significant business and political influence. Excessive commercialization and ownership structure are the main risk factors for corporate and political interference in editorial content. Until recently, the influential media in the country were in the hands of powerful industrialists (eg NOVA TV and the Domuschiev brothers). The large media groups created as a result of the concentration of property are forced to survive in the conditions of a small advertising market (BGN 455 million in 2020) and with the existing possibility for legal support from the state (Hristova, 2010).

An alarming phenomenon is the support of media revenues with resources from European funds distributed by the government. Thus communication budgets of European programs help to buy media in Bulgaria (Ognyanova, 2019). In the period from Bulgaria's accession to the EU (2007) until 2018, the media received BGN 58.277 million through direct negotiations with the government, without conducting public procurement, to advertise the activities of European programs. Among the recipients of the largest sums were TV7, which was linked to the bankrupt Corporate Bank and MP Delyan Peevski (BGN 2,437,000), Channel 3 (also owned by Peevski), Nova Broadcasting Group and bTV, as well as the PSB (BNT and BNR).

The disbursement of such funds, directly and uncontrollably by the government, helps the media to become permanently dependent on the authorities. This is one of the reasons for the rise of contract journalism in the country, in addition to the takeover of the state by big business. Many media companies do not undertake to protect their journalists and are increasingly offering journalists contracts for services instead of full-time employment contracts, and little if any social benefits. For example, the new owner of NOVA TV in 2019 fired the top three investigative journalists after they refused to accept a contract to provide freelance services instead of full-time contract.

Thus, the media and journalism are often becoming hostages of business and political interests. Expert Evgeniy Todorov points out that “an important issue is that there exists a “directing” of the advertising - respectively cash flows, to a certain circle of media and the neglect of other media. Also, an issue is the existence of party media, which mainly support themselves with party subsidies, i.e. with taxpayers' money. Despite the rules on the inadmissibility of state intervention, many media are supported by various state aids - incl. European funding, where the financing is based on unclear schemes”.

In response to the interest in the ownership of influential media in Bulgaria, public registers have been established with the Council for Electronic Media for owners of electronic media (Council for Electronic Media, 2018) and with the Ministry of Culture for owners of print media (Ministry of Culture. Register). However, the real owners and their interests, especially of the big, mainstream media in Bulgaria, often remain hidden behind formally registered companies and individuals. Revealing the real owners to the public is usually the merit of the country's investigative journalists. In this sense, the information in the maintained registers may seem abundant, but it does not give an idea of the real state of property in the Bulgarian media and in a sense is useless.

The concentration of media in the hands of several large companies is no less alarming for Bulgarian journalism. It creates serious conditions for deteriorating the sustainability of the media industry and media pluralism in the country, interfering in the editorial content, commercializing the journalistic profession, deteriorating the quality of work of journalists, and lowering the journalistic professional standards. This is due to the pronounced commercialization of the media included in the portfolio of large companies with a variety of activities, com-

bined with insufficient self-regulation of the media. Their main goal is to generate profits and to work for the corporate interests of the media owners, instead of for the public interest service.

General rules in the Competition law do not include specific provisions for the media market in particular. At the same time the actual level of concentration is impossible to track due to a deficit of precise data, which is considered as a risk itself. These concerns are regularly present in the annual reports of the European Commission for Bulgaria, Freedom House, Reporters without Borders, etc. The risk of concentration on news media, online platforms and the possibility of influence by owners and advertisers on editorial content is assessed as the highest.

Full data on total revenues (including advertising, sales, subscriptions, etc.) generated in the different media sectors are not available. Accessible information on market shares is based only on partial advertising revenue data. Based on such incomplete information, the Top 4 concentration calculations show a high level of concentration in the audiovisual sector – 92%, and 57% concentration in the newspaper sector (Center for Media Pluralism, 2016).

### 3.3. Public service media

One of the notable shortcomings of the RTA is that it failed to introduce an effective system for public funding of BNT and BNR and left both national public service electronic media to be financed by the budget subsidy and not by society. A system of payment for the programs of the national radio and television operators existed in the socialist era, when a monthly fee was paid through the Bulgarian postal services. After the democratic changes the monthly fee was abolished for some time and then proved impossible to be reintroduced. According to art. 98 of the RTA an independent radio and television fund is set up at the audiovisual regulator – the Council for Electronic Media (CEM) - for financing of radio and television activities. The law provides for detailed spending of the fund but the provisions remained a dead letter only and public service broadcasters are still funded by state subsidies, advertising and sponsorship. The absence of such fund deprives BNT and BNR of the opportunity to become real public service broadcasters and other radio and TV broadcasters – to be financially supported in the production of socially significant projects.

The financing of the public service media is to a greater extent by a budget subsidy and without stable guarantees for financial organizational and content autonomy. This questions the independence of the Bulgarian National Radio (BNR) and the Bulgarian National Television (BNT) from the ruling political class. As reported by the Open Society Institute in 2005 and 2008 political elites remain determined to keep public service broadcasters under tight control after the democratic changes and this takes place with a greater or lesser intensity across the Central and Eastern European region. When these countries entered the Council of Europe, and later acceded to the EU, it was critical that they should meet existing European standards of public media independence. During the period of negotiation before entry politicians refrained from influencing public service media (Television across Europe, 2008). However, after joining the EU had been completed political elites began to meddle in the affairs of public service media in subtle and indirect ways. This ranged from nominating individuals who were close to parties and alliances for Director Generals' positions and membership of the managing boards, to rigging the selections for positions within the regulatory authorities (Zankova, 2014).

### 3.4. Production conditions

In the National Classification of Jobs in Bulgaria, the profession of journalist is introduced for the first time after 2010. Before that, journalism was placed at the crossroad of analytical and creative positions (Fileva et al, 2010).

Bulgaria is among the EU countries with the lowest number of employees in the media - about 1.5% of the country's workforce (Eurostat, 2021). The databases of the National Statistical Institute lack data on the number of employees in the media sector in Bulgaria. Professional organizations are under-represented and also cannot provide reliable information. Indirect data can be obtained from Eurostat. However, Eurostat statistics do not specify exact figures. Taking into account the data of the National Statistical Institute on the number of working Bulgarians, it can be estimated that the media employ about 31000 people (National Statistical Institute. Employed in Enterprises, 2020).

### 3.5. Agency of journalists

After the democratic changes in the country of 1989, the oldest professional organization – the Union of Bulgarian Journalists, gradually lost its influence and was unable to provide representative information about the number and working conditions of the journalistic professionals in Bulgaria. In 2016, the Union proposed the creation of a Law on the Protection of Journalistic Labor, which would guarantee decent pay and fair working conditions for Bulgarian journalists, but the idea did not materialize (Union of Bulgarian journalists, 2016).

### 3.6. Journalists' working conditions

According to a non-representative survey among journalists conducted in 2020, less than half of respondents work on an employment contract (45.5%) (Association of European Journalists, 2020). Between 2015 and 2020, the number of freelancers employed in the media without social security increased, and one third of the respondents indicated that their income had decreased during this period. In return, the pressure on professional journalists related to their work is growing, including through prosecution. In addition, regional journalism is on the verge of extinction, at the expense of strengthening large corporations, whose portfolio includes the most influential media in the country. This same study points out that women outnumber men working in the Bulgarian media - 54.5% versus 45.5%. 75% of the respondents have a diploma of higher education, nearly 9% have a PhD degree. The largest share of respondents (32.2%) are between 30 and 40 years old. The second largest group (24%) are between 40 and 50 years old.

Expert Ivan Takev says,

*“The issue of media ownership and concentration must be clarified and clearly regulated and registered. The journalistic community must consolidate and clearly state their demands for working conditions and pay levels. The division is currently causing general professional trade union demands to be made. There exists huge pay gap between commercial and public service electronic media” (Interview, 2022).*

### 3.7. Journalistic competences, education and training

Little is known in Bulgaria about the realization of students graduating with an academic degree in journalism and communications, as there is a lack of detailed and up-to-date information from the Ministry of Education and Science and the universities. Six public and three private universities in the country are involved in the training of such specialists. From the data of the National Statistical Institute it is clear that the number of students majoring in “Journalism and Information” (bachelor's and master's degree) in the period 2017-2021 decreased from 2 555 to 2 115 (National Statistical Institute. Students, 2021).

The Ministry of Education and Science maintains an annual ranking of universities in the country in various fields, including the field of Public Communications and Information Sciences

(Ministry of education and science, 2021). The methodology for calculating the ratings is based on 100 indicators, one of which is the realization of graduates in the labor market. The authors of the ranking report that they collect the necessary information through the National Statistical Institute (NSI) and sociological surveys. However, the NSI yearbooks lack information on the realization of graduates in Bulgaria (National Statistical Institute. Statistical Yearbook, 2020).

### 3.8. Professional culture and role perception

The international organization Reporters without Borders is concerned that the practice of journalism in Bulgaria is not safe. The general legislative framework sets minimum standards for the protection of journalists. At the same time, corruption, insufficient independence and low efficiency of the justice system make the state often toothless vis-a-vis press freedom violations. Independent media and investigative journalists are regularly victims of abusive procedures, or SLAPPs. All the problems of freedom of speech that exist in different parts of Europe are widespread in the country, including “physical attacks and defamation campaigns against journalists, impunity for violence against them, harassment, lack of media pluralism” (Free Europe, 2021).

The three major TV channels in Bulgaria maintain programs for investigative journalism. Media investigations have had varying degrees of success – the most common result of which is the production of a media sensation, certain officials being fired, but they rarely have an impact on the country's system and legislation. Investigative journalists in the major commercial media are often suspected of serving the interests of media owners by putting pressure on their business partners or opponents. The change of ownership and media concentration are often accompanied by dismissals of investigative journalists in the major Bulgarian media (for example, the dismissal of Mirolyuba Benatova, Genka Shikerova, Marin Nikolov from Nova TV in 2019). This is one of the reasons why in the last decade there has been an outflow of leading investigative journalists from the TV screen of influential Bulgarian media to online based platforms (for example, Bureau for Investigative Reporting and Data/BIRD by Atanas Chobanov, Nikolay Staykov from Anti-Corruption Fund Bulgaria, Afera.bg), etc.

The picture of investigative journalism in Bulgaria is quite controversial. On the one hand – there is a strong government and corporate pressure on media owners, on the media themselves, and on independent investigative journalists, and on the other hand – successes of investigations related to the National Science Fund, a candidacy of a judge for a constitutional judge and others. Investigative journalism, however, can and should to also investigate the media environment, not competing media, but all media in which deviations from the principles of the Fourth Estate have been noticed. A good example is the functioning of The Radostina Konstantinova (one of the founders of the Press Group "168 Chasa" and the newspapers "168 Chasa", "24 Chasa", "Monitor" and "Politics") Foundation, established in 2011 with a main goal to promote objective investigative journalism in Bulgaria by supporting colleagues from all media who have chosen this difficult genre (Foundation Radostina Konstantinova).

Despite the positive steps unfortunately in Bulgaria investigative journalism is not always fair. Methods of work which are used do not always respect privacy and other human rights. Often media fuss hampers those affected by investigative publications to provide reasonable explanation about their conduct. Sometimes they are not given the opportunity to do that and to make known to the public their motives and position (Zankova, Kirilov, 2014). There are cases when rumors are offered to the public instead of serious analytical pieces without sufficient proof and solid analysis. Results depend very much on the media editorial policies and their staff. The latter does not always apply the rules of responsible professional journalism. Besides it is not uncommon investigative journalism to be perversely used for the narrow interests of political and business circles. The Mediadem report about Bulgaria from 2011 pinpoints cases of paid

publications, trading in influence and niche-reporting through which different political and economic interests are channeled by journalists (Smilova, Smilov, Ganev, 2011).

The widespread practice among Bulgarian journalists of trading in influence is also noted as a major problem with the Bulgarian media by the US State Department. Other scholars focus on the alarming tendency of establishing close ties between journalists and politicians leading to paid publications and corruptive practices and generally to an unhealthy and sleazy political environment (Dobрева, Pfetsch, Voltmer, 2011: 189). This serves as a proof that there is a strong opposition towards investigative journalism but also that the criteria do not always coincide with the public interest and expectations.

## 4. Risks and opportunities of media usage patterns domain

### 4.1. Development and agency of change

The studies and analyses of media consumption in the country from 2000 to 2020 are not sufficiently regular and systematic. Most of the research examines issues related to access to media, media diversity, public trust in the media, and frequency of media consumption by different age and social groups. Research from 2000 to 2008 on the topic is less extensive than that from 2009 to 2020. A richer database of research on media consumption from the beginning of the century is found in the period of 2020-2021. Back in the years, in a number of studies some cyclicity on an annual basis is witnessed. Most of these studies (or reprints of them, or journalistic materials based on information from them) are freely available in the public domain. However, a paid subscription for access is required to use some of the data. Research over the years has shown a predominant trend of inertia in the field of media consumption.

In the studied period rhythmic research on media consumption in Bulgaria is comparatively scarce, although certain cyclicity is observed, such as that of the Interactive Advertising Bureau, which from 2016 to 2020 annually examines revenues from digital advertising in the media (Interactive Advertising Bureau). Another example is TV & Digital Report - research by Publicis Groupe jointly with GARB and Nielsen Admosphere on media consumption, public preferences for different information channels, intensity of viewership, etc. in 2020-2021 (Publicis Groupe, 2021). The studies are on a monthly basis and each of them is focused on a separate media or news program. For several years in a row since 2008, research by the Nielsen Company has been available on the Internet, providing in-depth measurement and analysis of the Internet audience, advertising, video, and media with user-generated content (Nielsen Online 2008, 2009).

Data from reports of the Open Society Foundation for 2011 show the dynamics of the media usage comparing the popularity of cable TV, satellite TV and IPTV (Open Society Institute–Sofia, 2011). Although Bulgarians enjoy one of the fastest internet connections in the world, broadband access is generally unpopular. In the country as a whole, e-government and customized audio content services are not well developed. On the other hand, there is a widespread distribution of torrent trackers. The top ten most visited Internet sites in Bulgaria, according to the data of the global counter [alexa.com](https://www.alexa.com), owned by the company “Amazon”, traditionally include the search engine Google, YouTube, Facebook, e-mail abv.bg, Wikipedia, some sites for trade and sales ads. Only after them are ranked the sites of information, commentary or entertainment media, television, radio, etc. (E-vestnik 2021). In addition to traffic to sites on the global network and by country, the counter also records data such as average length of stay per reader, number of pages read and many other indicators, such as

links to the site, search, keywords and more. Some sites may use methods to artificially generate traffic, but the ranking in recent years is relatively stable for the most visited ones.

## 4.2. Agency of media-users and analysts

The topic of the media preferences by the audience for different generations of users is rarely addressed. Among the findings of the research are that people are more likely to make their choices rather emotionally than rationally and that in recent years people receive the news first from social networks, i.e. audiences are becoming more passive and inert, making no effort to provide themselves quality information. It turns out that the social network Facebook makes the choice instead of audiences - with sponsored posts, with shared news from friends, with quotes and likes from the environment. In addition, the user and the journalist nowadays often find out about an event at one and the same time. The days when people found out from TV about the daily events during the day are over. That is why very often viewers watch TV products not so much to understand what has happened, but because of the way these events are presented. Ultimately, the usefulness of the media remains informing audiences (Lyubenova, 2016).

An Open Society Foundation study in 2009 found that among today's generation of 18-30 year olds, internal stratification among young people is a source of potential conflicts. Against this background, a deep generational conflict has been going on for last ten years (Dichev et al, 2009). According to the same study, children and young people are somewhat characterized by „media multitasking” - they do not watch programs in a certain period of time, but consume TV content flexibly, combining it with the phone, laptop or tablet. Watching television is often seen as a „background”, secondary activity, which invariably weakens the position of television as an effective media channel for children and youth. There is a high level of digital inclusion and connectivity among children and young people. The risks and vulnerabilities in connectivity are disproportionately higher among children and young people from vulnerable groups, for whom access to the Internet can be the difference between social exclusion and equal opportunities. Providing access to digital devices and connectivity that meet all digital needs, including education, is still an unfinished endeavor in Bulgaria, according to this study.

Research on media consumption by older people is fragmentary. In most cases, the studies are not specifically focused on them, but rather are part of a comprehensive audience survey. People over the age of 55 watch TV more often than any other demographic: between six and seven hours every day (Antonova, Georgiev, 2013).

Continuing growth on an annual basis for the time spent on the Bulgarian Internet sites is also visible in Kantar's analysis for 2021 for television and digital consumption. It is noteworthy that the growth is not equal for different age groups. It is greatest for older people over 65 and significant for people over 45. The data do not include social networks and foreign sites, which partly explains the shorter stay of young people. It can be said with great confidence that 2020 digitalized the elderly in Bulgaria (Redlink.bg, 2021).

As a result of the coronavirus pandemic, the media enjoyed increased interest. People stayed at home and media consumption increased significantly. The dominance of television is also growing. By the beginning of 2021, 57 percent of Bulgarians between the ages of 18 and 65 watched television several times a day. Only 4 percent said they do not watch TV. It can be concluded that the older generations (over 50 years of age) are still informed mainly by traditional electronic media - television and radio, while young users search and compare different sources of information - traditional and digital. New generations are more critical of news and coverage of important societal issues (Kirilova, 2019).



Compared to other electronic media and print media, television has the greatest impact. Before and during the COVID-19 pandemic (2019 to 2021), there was an increase in the time spent watching TV by all age groups, including the elderly, with an overall increase in viewership of the entire population by 2020 of 9 per cent. The largest increase was in viewers with an average age of 35-44 years (17%), followed equally by two other age groups – from 15 to 24 years and from 25 to 34 years (14%). The time spent for watching TV by the adult population over 60 years of age has increased by 9% and of the children aged 4 to 14 – by 8%. There exists a different approach of the young generation to media consumption. The center of gravity of young people is shifting from the professional sphere to leisure; consumption is often a more important identifier than career or status. The line between work and leisure has become problematic. Thus, the public is displaced by the private; communities - by networks. The adult population between the ages of 66 and 75 watches the most television (they belong to the so-called heavy users), reads newspapers and magazines compared to all other age groups. Only in listening to the radio they compete with the group of listeners from 46 to 55 years of age (Nieslen Atmosphere, 2021).

Audiences increasingly prefer easily digestible information, preferably presented through video. More and more people are relying on social media to choose information, thus becoming more and more inert in their search for media. The leading device for reading and watching news is the smartphone, which is decisively ahead of the personal computer. Among children and young people, there is a high level of digital inclusion and connectivity - nine out of ten Bulgarians have a personal smartphone to access the Internet. However, it is disturbing that there are still children and young people who do not have their own device capable of optimally meeting their educational needs and goals (such as a laptop, tablet or computer).

### 4.3. Access to news and other media content

Convergence is a fact and imposes new conditions in the cultural and media sphere, Internet platforms, competition and regulation. Society does not only experience the impact of the new larger market but also the formation of a novel public sphere. At the same time the world has to cope with various crises – health, war, informational. Bulgaria is not isolated from global hardships in this respect. At the end of the second decade of the 21st century there is an unprecedented merger of the telecommunications, media and online industries in Bulgaria. Regulation should protect the values of human rights and freedom of expression of the new public sphere and this is a huge legal challenge for Bulgarian media legislation. According to expert Margarita Pesheva “Numerous news and entertainment sites have been created in Bulgaria, which compete with major radio and television programs”.

Bulgaria ranks 26th of the 27 EU Member States in the European Commission Digital Economy and Society Index (DESI) in 2022. Bulgaria’s DESI score grew at an annual average of 9% over the past five years. Given the positioning of Bulgaria, this growth rate is not sufficient for the country to catch up with the other EU Member States. On digital skills, despite recent increased efforts, the country remains significantly below the EU average, having a score of 32.6 versus the EU average of 45.7. The proportion of individuals with at least basic skills and above basic digital skills is well lower than the EU average, the latter significantly so (8% versus the EU average of 26%). Considering the EU’s ambitious target of 80% of adults having at least basic digital skills by 2030, the country needs to step up efforts, as more than two thirds of its population lack such skills. Bulgaria also underperforms on the proportion of ICT specialists in the workforce (3.5% versus 4.5% EU average). However, the proportion of female ICT specialists is high.

On Connectivity, Bulgaria score very well on Fibre to the premises coverage (85% of households vs 50% in the EU), it has low prices, but both fixed and mobile broadband take-up is low. In

addition, only 25% of 5G spectrum has been assigned (EU average: 56%). On the business side, the adoption of digital technologies by SMEs remains almost half the EU average. Only 6% of Bulgarian enterprises use big data, 10% cloud and 3% artificial intelligence (AI), as opposed to the EU 2030 targets of 75% for each technology. To support business digitalisation, Bulgaria is making use of European Digital Innovation Hubs. Four European Digital Innovation Hubs proposed by the country received a successful evaluation result and another eight proposals got a Seal of Excellence.

Bulgaria is facing many challenges regarding the digitalisation of its public services, as it underperforms in most indicators, with the exception of open data, which is on par with the EU average. Only 34% of internet users interact with the government online (65% in the EU). The supply of digital public services for citizens (with a score of 59 versus an EU average of 75) needs to improve significantly to enable Bulgaria to contribute to the 2030 Digital Decade target of all key public services offered fully online. To achieve this goal, Bulgaria has launched the National Registry reform and defined the path to enhance digital transformation. To overcome the shortcomings in Bulgaria's digital transformation and to put it on a par with the other EU Member States, there needs to be a continued, sustained effort at political and administrative level that builds on the country's strengths to deliver on the reforms and investments in all four dimensions. The recent political instability may have significantly affected attempts in this area.

The first steps towards media digitization were very difficult in Bulgaria. "Synchronizing national with European legislation: a screen for lobbying amendments against the public interest" is the conclusion of the report "10 years of Bulgaria in the EU" about the achievements of the Bulgarian media law and system. An illustration of this unfavorable twist is the digitalization of terrestrial broadcasting, launched in 2009, with the synchronization of respective Bulgarian legislation with the European one, as the country's commitment from 2012 was. Not only was this commitment not met, but criminal proceedings were instituted against the country, culminating in the imposition of sanctions. „Digitalization has been postponed several times and the common understanding is that the process is deliberately protracted, opaque and political parties and economic circles are trying to find the best solution for themselves, but not for the benefit of citizens. The voice of commercial interests overshadowed the civil society representatives during the debate on the adoption of this law" (Antonova, Georgiev, 2013).

In 2013, all four multiplexes that were to operate in the first phase of digitalization turned out to be financed by one bank - the Corporate and Commercial Bank (CCB) - and this fact revealed the process of fusion of the broadcasting sector not only with politics but with the banking business as well. After the bankruptcy of CCB in 2015 digitalization in Bulgaria stopped and practically came to nothing. Meanwhile, on 19.05.2011, the European Commission initiated criminal proceedings against Bulgaria regarding the compatibility of a number of provisions with Directive 2002/77/EC. The Commission recommended the introduction of a new competitive procedure to allow a new efficient player to enter the terrestrial digital telecommunications market before 2013. Experts emphasize that many legal obstacles have been deliberately placed before potential participants and thus have emptied the whole process of its positive effects without any socially significant result (Zahariev, 2015).

The introduction of the EU regulation on digital markets and digital services is on doorsteps and will comprise a novel stage in European regulation and control to counteract the non-transparent and dangerous policies of big platforms when all European member states are connected and dependent on one another and should act in close collaboration with one another. Such approach based on effective cooperation will represent probably a new critical juncture for media legislation and its implementation in Europe.

#### 4.4. Relevance of news media

The discussion on the diversity of distribution of media content (external and internal pluralism) aims to ensure that citizens have access to different points of view so that they are able to make informed decisions (OFCOM, 2021). In Bulgaria, structural media pluralism is guaranteed. It is supported by national statistics: 120 TV broadcasters, 77 radio stations, 209 newspapers (National Statistical Institute. Culture, 2020).

It is clear from the public register of the Council for Electronic Media that by 2021 the specialized programs with profile of entertainment, film, music, education, etc. prevail. News content is provided by polythematic or entertainment radio and TV broadcasters. News programs have been criticized for not providing enough diversity of opinions. There is a relatively constant set of “speakers” and the so-called influencers that main-stream media compete to show and through which they try to shape the public opinion. The options of users to reach a different point of view is further limited by political and/or corporate interference in the program content. In this regard, there is a rise in “self-censorship” of the media as an attempt by media owners to secure the favor of government and access to public financial resources. The media in Bulgaria receive BGN millions from the state and municipal budgets, as well as funds for participation in the communication campaigns of the various European Union funding programs (Ignatova, 2021). The money from the European funds is distributed directly by the state institutions without public procurement. According to experts and journalists, this is a mechanism for non-transparent funding and a prerequisite for political interference in media content (Kostova, 2022).

Thus, the seemingly existing external pluralism cannot sufficiently provide the necessary internal pluralism (diversity of content and viewpoints available to different social and demographic groups), which plays a key role in shaping the audiences’ own positions and decisions.

By the way, the Bulgarian legislation imposes a requirement for internal pluralism only to the public service media. The requirements to the commercial broadcasters are for observance of objectivity and good manners, protection of the physical, mental and emotional health of the children, avoidance of discriminatory and hate speech, etc. Legislative intervention and maintenance of high professional standards by the media are needed to avoid the risks of trampling on internal media pluralism.

*“A tangible process of professional regression is observed - of copy-paste journalism, of information monotony in media diversity: impoverishment of content such as genre, thematic and regional coverage. We cannot put everyone under a common denominator - there are professional journalists and non-professional journalists. Not a few journalists are trying to do quality journalism, to defend a civil position, despite the pressure exerted. A number of professional qualities and dignities in relation to journalistic functions still manage to preserve two public service media – the Bulgarian national radio and the Bulgarian telegraph agency” (Lulivera Krasteva, expert. Interview, 2022).*

According to the joint annual report of the Center for Media Pluralism and Media Freedoms and the Robert Schuman Center, the biggest risks for the Bulgarian media environment lay in the field of market pluralism, political independence of the media and social exclusion (Center for Media Pluralism, 2016). The risk of violating freedom of expression is relatively low. The result is supported by the annual ranking for global freedom of Freedom House, where Bulgaria is defined as a free country, with 78 points out of 100 possible. The report notes: “While the media sector remains pluralistic, ownership concentration is a growing problem. Journalists at times encounter threats or violence while working” (Freedom House, 2021).

## 4.5. Trust in media

Despite the prevailing preference of the Bulgarian audience for television as a source of information, a number of studies, including that of the Konrad Adenauer Foundation jointly with the sociological agency Alpha Research, display a lasting and overall decline in media trust in general. The study addresses the issue of media freedom and shows that media trust remains low, with only 10 per cent of Bulgarians accepting the independence of the country's media. This result confirms the low values of the previous 2017. Trust in the work of journalists is also low: only 9 per cent of respondents are convinced that journalists cover professionally current events. Although television is losing some of its popularity in terms of the media used, it is watched by 83 per cent of respondents and thus far exceeds the results of other types of media. On the other hand, the reading of online news portals has risen to 28 per cent, followed by social networks and print media (21 per cent each) and radio (19 per cent). Among social networks and social media with a huge lead and most popular is Facebook, followed by YouTube, Viber and Instagram, which are not so popular news channels (Konrad Adenauer Foundation, 2018).

Research conducted in 2020 by the Media Program for Southeast Europe of the Konrad Adenauer Foundation and the sociological agency Trend reflects the change in the trust and attitudes of Bulgarian citizens in connection with the changed political, healthcare, and socio-economic situation in the country as a result of anti-epidemiological measures against COVID-19 in 2020 (Konrad Adenauer Foundation, 2020). The percentage of people whose trust in the media has dropped is much higher – its share is 29 per cent. However, as early as March 2021, immediately after the quarantine was imposed, the growth of television viewing reached double digits for all target groups. This trend continued permanently until the end of October 2021.

Overall, research over the years has shown a predominant trend of television audience impacts over other electronic and print media. 60 per cent of Bulgarians trust television news. (Nieslen Admosphere, 2021). Online news portals, social networks, print media and radio follow with a big difference. The dissemination of fake information continues to play an important role. The majority of respondents think that fake information is disseminated mainly through the print media (37 per cent) and social networks (35 per cent).

Despite the overall decline of public trust in the traditional media due to both their economic and political commitment to the powerful of the day and the trade-offs they make in their efforts to adapt to the technologically changing media environment, as well as despite the declining trust in social media and social networks, mainly due to the spread of fake news in them, media remain the main source of information for the Bulgarians.

According to the expert Danail Danov “Journalism: trust in media is quite problematic. The very fact that showbusiness “stars” continue to be given a high social respect, and often elected at various political positions, mainly due to intensive media coverage and popularity, prompts that real journalism does not dominate the Bulgarian media landscape. Certainly, there are examples of decent journalism, often happening in media with small impact, in terms of audience and/or circulation. Professional standards continue to be violated, corporate pressure continues, pluralism, balance and fairness of media coverage is not necessarily guaranteed”.

## 5. Risks and opportunities of media-related competencies domain

### 5.1. Development of agency of change

Studies on media competencies in Bulgaria has been on the rise in the last five or six years, mainly by non-governmental organizations and researchers from the scientific community. The

Bulgarian legal document relating to media literacy is the Preschool and School Education Act (2015), but the law does not contain an official definition of media literacy, and media education is not explicitly linked to the allocation of resources. Media literacy is only implicit in this new law. After the COVID pandemic, when life passed online and even older people who had not actively used the Internet and social networks had changed their habits, it became clear that they also needed media literacy.

During the last decade the Coalition for Media Literacy started to organize courses for older people, without specifying their age. The project “Academy for the Elderly: Online Media Literacy” is implemented by the Association “Coalition for Media Literacy” with the financial support of Sofia Municipality – Program “Europe’2021”. The program is aimed at the so-called “newcomers” to social networks, older people who already have access to the Internet via smartphones, but do not have yet developed skills for safe and full use of new communication channels on the Internet. Topics included are how to distinguish reliable from unreliable sources of information; how to recognize fake profiles on social networks; how to protect oneself from online fraud, what are the risks associated with consumer’s personal data online.

In the analyzed period (2000-2021) several critical points with regard to media competencies stand out. They are mainly related to the media literacy of children and young people, fake news and, accordingly, to the trust and consumption of the media. National policy on media literacy is still underdeveloped despite efforts and positive developments in this direction. At the end of 2020, the requirements of the Audiovisual Media Services Directive (2018/1808) were transposed into Bulgarian legislation for the introduction of measures to promote and develop media literacy of citizens of all ages and for all media (Article 32, para. 24 and Article 33a of the Radio and Television Act amends SG No. 109/2020, in force since 22 December 2020). Media literacy was introduced in the curriculum of formal education in Bulgaria in 2018 with the amendment of Ordinance №13 of 21.09.2016 on civic, health, environmental and intercultural education. Most studies are from the period 2016-2021 and are aimed at students and their teachers and parents. However, for the development of media literacy and competence only 10 school hours are provided for the twelve-year course of secondary education in Bulgaria. Although civil society organizations, such as the Media Literacy Coalition, actively organize and conduct media literacy training, including for teachers and the elderly, such initiatives cannot offset the need. from systematic education. “Media literacy of the audiences is a basic prerequisite for communication contact. This applies to all spheres (political, social, cultural, etc.) information”, according to the expert Petko Todorov.

## 5.2. Overview of media related competences in policy documents

During the COVID pandemic when state of emergency was introduced in the country (2020–2022) there were attempts to regulate disinformation in and through the media. The VMRO (The Internal Macedonian Revolutionary Organization – IMRO) party, a coalition partner to the then party in office GERB (Citizens for European Development of Bulgaria – CEDB), submitted to the National Assembly a set of changes to the Radio and Television Act (Bill, 2020) and the Personal Data protection Act (Bill, 2020 a) that relate to the spread of “fake news” and disinformation online.

Most of the experts and journalists in Bulgaria considered such legislative initiatives to be in contradiction with the Constitution and the concrete circumstances of the pandemic when the state of emergency curbs legitimately some human rights, society needs more communication and information and additional restrictions on freedom of expression will be unproductive. The proposal envisaged the creation of a GDPR department in each media to monitor the protection of consumers’ IPs because they are also covered by the European law. Access to sites without

such departments should be suspended on the territory of Bulgaria, regardless of the location of the server.

The main legislative changes comprised:

- Extension of the Radio and Television Act or the Personal Data Protection Act to encompass online media as well as electronic versions of newspapers and magazines;
- Enlarging of the competences of the Council for Electronic Media (CEM) or the Commission for the Protection of Personal Data to encompass the prevention and restriction of dis/misinformation in the Internet environment;
- Creation of a new Public Register of Media Services provided via the Internet;
- Imposition of a penalty on the domain owner (page) when a non-authored article containing dis/misinformation is published in the domain (page).

The Bill defines „Internet misinformation” as: dissemination through social networks, websites, or otherwise in the Internet environment through websites accessible in Bulgaria, of a publication containing false information concerning individuals or legal entities.

The adoption of such law was meant to introduce also changes in the Criminal Code where a new criminal act – dissemination of dis/misinformation through mass media and online media should be inserted (Bulgarian Center for Non-Profit Law, 2020).

These bills raised a lot of questions about their possible implementation as well as concerns that they may perfectly serve as tools of censorship. According to the Constitution of the Republic of Bulgaria (Article 40), the mass media are free from censorship, and the suspension of media (such as websites) is allowed only by an act of the judiciary, and in exceptional cases. The bills provided for a suspension ordered by administrative bodies which will search for a court order afterwards. The Association of the European Journalists in Bulgaria (AEJ) considered the bills „completely unconstitutional” since the basic law provides specific grounds for closing down of a medium related to „the protection of the constitutional order, incitement to commit a crime or violence against the person and violation of good morals”. During a crisis, a number of legislative measures can be justified in order to preserve the life and health of citizens. However, the hasty adoption of laws that might have an unclear and even dangerous effect after overcoming the crisis should be avoided. Insofar as the fight against fake news is on the agenda not only in Bulgaria, but also around the world, it must be subject to a balanced and well-thought-out policy that does not affect freedom of expression. In its annual report on the state of human rights in Bulgaria the Bulgarian Helsinki Committee (BHC) also discusses the issue about the two bills against misinformation in a pandemic situation and states its opinion that these are unfortunate attempts to restrict free media and journalism when their contribution is mostly needed (Bulgarian Helsinki Committee, 2020).

### **5.3. Information about the media literacy programs in formal and/or in non-formal education**

Some of the analyzes and research regarding to early training in media and digital literacy are related to conducting various initiatives for creation such skills in students and to collecting data on the habits and attitudes of children and young people. They also contain specific recommendations and proposals that will lead to an increase in their media competences. The basic idea is that media and digital literacy is becoming a mandatory part of the notion of literacy per se and early training is necessary and important for development, adaptation, education and successful socialization in the future.

In 2021, for example, for the fourth time the Coalition for Media Literacy organized the campaign “Media Literacy Days” with the aim to promote the importance of media literacy for

society. The campaign included online training and courses for mentors, teachers and students, as well as for the elderly in small towns. The Coalition has launched a series of online trainings for teachers, which includes a practical handbook “Media Literacy through Distant Learning”, offering ready-to-teach lessons and homework projects to be prepared in a team. Developing a comprehensive media literacy training program is also the subject of recent studies (Danov, 2020).

One of these studies of the Coalition for Media Literacy “Media, Parents and Development” (2021), examined parents' and children's perceptions of media and digital media literacy, trust in different types of media, the frequency of media content usage, and time spent on the Internet. The study is among 1190 parents. Approximately one in three is convinced that their competence to evaluate media content is excellent. However, nearly 39 percent say that not only children but also parents need to develop their media literacy. Television, radio and Wikipedia are the first three sources of information cited by respondents. Media literacy presupposes the existence of competencies that help trainees of all ages to be able to correctly comprehend and interpret the content of any type of media - print, electronic and Internet-based (Coalition for Media Literacy, 2021). Activities in this area are initiated by non-governmental organizations, with the assistance of institutions such as municipalities, the Ministry of Education and Science, and schools. In this regard the Coalition for Media Literacy started to organize the campaign “Media Literacy Days” on a regular basis. The aim of the campaign is to promote the need to introduce media literacy in education (both formal and non-formal). As for functional reading, of course, it is embedded in the education of children in school. However, media literacy is more associated with the selection of sources of information, critical thinking, etc.

#### **5.4. Actors and agents of media related competences: risks and opportunities**

Media and digital literacy are perceived as an effective remedy against the spread of fake news and misinformation, as a tool for creating and training of critical and analytical thinking. Media literacy is a key element in the fight against misinformation in the EC Action Plan for European Democracy (European Commission, 2020). Media skills help people to judge, analyze, and verify information, and digital literacy allows them to navigate and participate fully online – which becomes a criterion for defining a person as “literate”.

The annual Media Literacy Index, developed by the Open Society Institute and being compiled since 2017, provides guidance in this direction. The index assesses the potential resilience to the spread of fake news in 35 European countries, using indicators of media freedom, education and trust between people. According to its latest edition of 2021, Bulgaria ranks 30th in the ranking of 35 countries and is in the penultimate, fourth cluster, along with Greece (27<sup>th</sup> place), Romania (28<sup>th</sup> place), Serbia (29<sup>th</sup> place), Turkey (31<sup>st</sup> place), Montenegro (32<sup>nd</sup> place). Bulgaria's position has deteriorated by one place compared to 2019, returning to the positions of 2018 and 2017. In 2021 Bulgaria has 29 points, having a deterioration compared to previous years (- 3 points compared to 2019, -1 compared to 2018, -2 points compared to 2017) (OSIS 2021). However, this is currently one of the few studies that specifically registers the level of media literacy in Bulgaria and measures certain indicators in this direction, in comparison with other countries. The indicators used by the index also illustrate the link between media literacy and media freedom and education. The indicators are media freedom, education and trust between people. Because the indicators are of different importance, they are included with different weights in the model. The most important are the indicators for media freedom of Freedom House and Reporters without Borders and those of education.

Media and digital literacy are among the prerequisites for media pluralism. The reason is that media and digital literacy guarantee access to more diverse sources of information. Research on

the matter also links the issue of social inclusion, as access to media helps groups of minorities and disadvantaged people to participate fully in public life.

The fourth edition of the Media Pluralism Monitor (2021) of the Center for Media Pluralism and Media Freedom at the European University Institute in Florence presents some conclusions in this direction. Research in the field of social inclusion focuses on access to media from certain groups in society: minorities, local and regional communities, women and people with disabilities, along with the conditions and factors for the development of media literacy in the country, including digital skills for all the population (Coalition for Media Literacy, 2021). A new indicator in the field of social inclusion has been added to the 2021 monitoring edition to assess the new challenges related to the use of digital technologies: protection against illegal and harmful speech. Efforts to counter misinformation and hate speech have been added to the fourth major area as specific digital issues that may hinder social inclusion.

According to expert Snezhana Todorova "We are witnessing the creation of a production pleasing to the powerful of the day, and their role as the guardian of the human right to information has been replaced by bespoke PR (white and black), as well as classic propaganda. This deformity harms society. The downplaying of the role of the media has a heavy impact on the journalistic profession, which is declining morally and materially. This leads to a hidden replacement of the profession, because journalists become PR agents, propagandists and advertisers".

## 5.5. Assessment of media related competences among citizens

Media and digital literacy are perceived as an effective remedy against the spread of fake news and misinformation, as a tool for creating and training of critical and analytical thinking. Media literacy is a key element in the fight against misinformation in the EC Action Plan for European Democracy (European Commission, 2020). Media skills help people to judge, analyze, and verify information, and digital literacy allows them to navigate and participate fully online - which becomes a criterion for defining a person as "literate".

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A very important aspect of media competencies is the selection of sources of information by consumers. Depending on their digital and media literacy, people decide where to get information, which predetermines the formation of their opinions on important topics and, accordingly, their behavior in specific situations. Research finds that the social network is a frequently used source of information in Bulgaria. According to a study conducted by the Reuters Institute,



global fears of false and misleading information have increased lately, with those who use social media more likely to think they have been exposed to coronavirus misinformation than those who do not use social media. Facebook is seen as a major channel for spreading false information almost everywhere (Reuters Institute, 2021). According to the data for Bulgaria, the media trust in the country is relatively low compared to the other 46 countries. At the same time, according to the report, more than half of Bulgarians use Facebook to follow the news. Many studies around the world have found a link between preferences for information on social networks and beliefs in conspiracy theories, which raises the question of the choice of sources of information as part of the skills associated with media consumption.

The fact that more than half of the Bulgarians rely on the social network to receive news also shows the need for a more in-depth study of the level of media competencies of the country's audiences. According to expert Svetlozar Kirilov "A main issue is the rise of social online networks and the ability of traditional media to compete with them for the attention of the audience and traditional media themselves to use the possibilities of social networks, incl. and the content created in them".

## 6. Analytical conclusions

The review of the studied sources and databases and the conducted analysis of the media environment in Bulgaria allow highlighting some of the critical junctures in the four research domains (2000-2021).

Although the country is defined as free in terms of political and civil rights (Freedom House), freedom of expression (Reporters without Borders), journalism and media market are at increasing risk of instability and dependence. The freedoms of movement of goods, capital, services and people of the European single market turned to be challenging to upholding of the basic pillars of Europe's audiovisual model, such as cultural diversity, media pluralism, and protection of minors, consumer protection, and intolerance of incitement to hatred.

The selected sources in legal and ethical regulation domain present the results of in-depth research on media law and media regulation of radio and television environment and the main aspects in self-regulation and media ethics. They also cover the legal framework of digitalisation of the electronic media and the main regulatory ideas concerning the new online media. The challenges generated by new media services for media freedom and independence are also examined. Possible critical junctures may arise as a result of the slow and incomplete media legislation, non-systematic implementation and the deficiency of media accountability, deficiencies in media self-regulation and media co-regulation.

The analysis of the selected research of the legal and ethical regulation domain allows highlighting some possible risks and opportunities for the media developments.

A substantial risk which is unalienable to legislation is that the political bodies may include too many restrictions in it concerning the media and journalists. An opportunity for the civil society and media organizations is to act strongly and present their own draft which is favourable to freedom of expression or at least introduce good amendments to the draft. Such steps presuppose professional and future oriented media community.

Risky is the situation when there is not up-to-date legislation and many gaps in the operating legal provisions exist. Media professionals can use the opportunity to entrench self-regulation and co-regulation in the media sphere.

Media professionals may struggle for setting some of the controlling competences of the audiovisual media regulator on media associations and deconcentrate political power.

Media representatives may initiate complex measures against concentration of media ownership and lack of transparency counteracting the risk media lobbies and businesses to grasp the initiative and introduce laws beneficial for those in power.

If media does not support good regulation that guarantees freedom of expression this may result in legal nihilism with all its negative consequences for the quality of the media environment. Expert Raina Nikolova says “The problematic regulatory framework has led to negative phenomena in the media sector, such as the fusion of the media business with political factors that do not allow the development of investigative journalism. The media are placed in financial dependence on the state. This is risky for maintaining high professional standards in journalism. In practice, the media turns out to be an insignificant factor in the democratic development of Bulgarian society”.

The lack of strong and demanding civil society, constant political pressure and submissive journalistic culture which does not vie for independence and high moral standards every day are other factors that have to be taken into consideration. A critical juncture could arise from the up-coming application of the EU digital services and digital markets package which will require close cooperation and harmonization of the actions of member states in the complex digital environment to enable transparency, user safety, and platform accountability against the trade of illegal goods, services and content online and manipulative algorithmic systems spreading disinformation.

The examination of the selected research sources on the media environment draws attention to several critical junctures for the journalism domain. Most of them are related to media pluralism in its various aspects - diversity of content and opinions, transparency of media ownership, political and financial (in)dependence of the media, social exclusion of certain groups, etc. The status of the journalistic profession with regard to: labor market and working conditions; training of practicing journalists and market realization of students in journalism; and sustaining of journalistic values and standards, reveal additional risks for the professional developments of journalism in the country.

All forms of media pluralism are threatened, the most critical being the state of market pluralism, political and corporate independence of the media. The possibilities for the development of media pluralism and the media environment in Bulgaria relate to the disclosure of the real ownership of the media and the interests of the actual media owners. In fact, even now, the actual media owners are becoming known to the public, thanks to investigative journalists in Bulgaria and despite the mimetic actions of the regulatory bodies and institutions provided for in the legislation. The impression is created that the state and society are driven by different motivations and interests regarding the transparency of media ownership in Bulgaria.

It is time for the competent authorities and institutions to stop being satisfied with the entry in the registers of formal market entities, behind which the real interests and media owners remain hidden. This would demonstrate real support for quality journalism and media discourse in Bulgarian society, part of which is deliberative communication. The need to develop a specialized methodology for calculating market concentration in the media sector, which would effectively support antitrust legislation and the work of the Commission on Protection of Competition, also becomes obvious. This means introducing a mechanism that takes into account not only the number of media owners, but also the share of acquired influence on the audience.

The introduction of effective mechanisms for the transparency of media ownership and for avoiding concentration in transactions in the media sector would be a good start for the recovery of the media market, for solving the serious problems in Bulgarian journalism and restoring the trust of the Bulgarian society in the media.

Other serious problems are commercialization of journalism, deterioration of the working environment and labour market for journalists, growing political and corporate influence and self-censorship, lowering professional standards, declining consumer trust in traditional media and the rise of online platforms. Opportunities to improve the media environment stem from overcoming the risks themselves. They require the will and coordinated action of political class, legislature, media owners, media and communication regulators, professional journalistic organizations, academia and civil society.

An important step in solving the above-mentioned problems is the creation of strong professional organizations to represent and protect the interests of journalists in Bulgaria. Special attention should be paid to strengthening the positions of public service media in Bulgaria, by ensuring independent financing, management and editorial policy, so that they are able to fulfil their public mission and balance the highly commercialized media environment. This requires the will and coordinated action of political class, legislature, media owners, media and communication regulators, professional journalistic organizations, academia and civil society.

Expert Valeriy Todorov thinks that “opportunities for better developments in journalism are connected with overcoming the insufficient investments for technological development, the limited market, the low pay for journalistic work, the already established political and economic dependencies, as well as with establishing higher criteria in the training of journalists, better financing of public service media, and more transparency of the activities of commercial media and the work of media regulatory bodies”.

The analysis of the research regarding media usage patterns shows that although considerable amount of reliable data is available, it is not sufficiently regular and systematic.

Two main critical junctures can be outlined: the decline of public trust in media due to their economic and political dependence and media consumption divide by age and social groups due to technological developments.

With the advent of the Internet, a complete reversal both in media’s world and the way they are created has been witnessed, as well as in the world of their audiences, in their expectations and attitudes. The Internet has transformed the once strict distinctions between print (newspapers, magazines) and electronic media (radio and television). Through a computer or smartphone, everyone can now listen to the radio and watch TV without actually having a TV or a radio set. Each of the media creates its own internet sites, and in some of them it is now possible to publish video materials from events, thus entering the competitive field of television. Through them, the viewers seem to be present live at what is happening. Live broadcasting of press conferences and other events of a different nature, which bring the audience directly to the place of what is happening, is becoming casual. For their part, TV stations create their own radio variants. News is available 24/7, there is no limit to its consumption, nor to the volume of information that is broadcast in the public space. The changes that occur, however, are not only positive. The risk factors affecting the quality of journalism are also increasing.

The decline in quality for the sake of speed due to the imposition of new technologies is witnessed. More and more often unreliable information is published, unverified by at least two independent sources. The tendency to include in the media milieu information without additional points of view, without pluralism, with less and less investigative materials, analyses, serious reports is growing.

The speech style, especially in electronic sites, moves on to casual everyday communication, very often sprinkled with jargon. Less and less attention is paid to correct literary Bulgarian language. According to expert Ivanka Mavrodieva “The risks are that the quality of journalistic materials will continue to decrease, that there will be no freedom of speech, that there will be no in-depth analyses and journalism in a large part of the media, especially in the online media”.

The amount of media outlets in which the selection of topics and their content is interesting for society but not serving the interests of society is growing.

The increasing difficulty to recognise and control of the fake news leads to a confusion in the audiences and its growing mistrust in media. The decline in freedom of speech is largely due to the concentration of media ownership for certain political or business interests. Reality shows, low-budget comedy shows, music formats, betting on the emotional features, prevail over the rational elements. The percentage of negative news increase compared to positive ones.

Audiences definitely prefer easily digestible audiovisual information. More and more people are relying to browse social media for information, becoming more and more inert in their search for media. The leading device for reading and watching news is the smartphone, which is decisively ahead of the personal computer. Among children and young people, there is a high level of digital inclusion and connectivity.

Although studies in the area of media competencies domain since the beginning of the century exist sporadically, they have been on the rise in the last six years in a more systematic and regular way. The topics are mainly dealt by non-governmental organizations, scientific institutes or independent researchers. The studies are focused mainly on the consumptions and perceptions of the audiences, but not on the producers of media content, nor on the political, economic and technological factors shaping the media world, regardless of their competent literacy on the most important component – media content.

The outlined critical junctures are connected with trainings to increase media and digital literacy; coping with fake news and misinformation; media diet preferences; technological challenges.

Starting from the understanding that media literacy is a condition for universal access to information, for the development of critical thinking and for effective empowerment of citizens, the lack of media literacy policy is assessed as a risk to media pluralism. Active literacy is driven by active measures, including the development and implementation of policies taken by countries to promote media literacy among different groups of the population, so that their citizens develop as sensible consumers and producers of information capable of recognizing how the media shapes popular culture and influence their choices and decisions.

In today's world, media competence is becoming an important skill, and both experts, civil society and institutions are increasingly aware of the need for efforts to improve these skills, including because of the increasingly easy circulation of fake news due to the development of new technologies, access to internet and the use of social networks. This explains the increasing interest in media and digital literacy and the increasing number of studies and initiatives in this regard, such as courses, seminars for children and students, as well as for the elderly, the so-called newcomers to the web.

In the hypermodern age, when technology is revolutionizing culture and it is no longer in the representations, but in the objects, brands and technologies of the information society (Lash, 2004), information and communication determine the parameters of the new “media” society. In order to sustain its proper functioning for the sake of deliberative communication combined efforts of all stakeholders (in the legal, regulatory, technological, economic, professional, academic, and social areas) is needed in all four domains.

## References

Access to Information Program. *The Status of Access to Information in Bulgaria*. Annual Reports.

<http://www.aip-bg.org/publications/%D0%9A%D0%BD%D0%B8%D0%B3%D0%B8/>

Afera.bg <https://afera.bg/>

Anti-Corruption Fund Bulgaria <https://www.youtube.com/c/AntiCorruptionFund>

Angova S., M. Nikolova, I. Vulchanov (Ангова С., М. Николова, И. Вълчанов) (2021). *Журналистика, Връзки с обществеността, Реклама. Новите комуникационни професии*. [Zhurnalistika, Vrúzki s obshtestvenostta, Reklama. Novite komunikatsionni profesii]. (Journalism, Public Relations, Advertising. The New Communication Professions София: Авангард Прима. Sofia: Avangard Prima)

Antonova, V. (Антонова, В.) (2015). *Медийните бухалки на мръсната власт*. [Antonova V. Medijnite bukhalki na mrasnata vlast]. (The Media Bats of Dirty Power). In: Capital. [https://www.capital.bg/biznes/media\\_i\\_reklama/2015/09/11/2608159\\_mediinite\\_buhalki\\_na\\_mrusnata\\_vlast/](https://www.capital.bg/biznes/media_i_reklama/2015/09/11/2608159_mediinite_buhalki_na_mrusnata_vlast/)

Antonova V., Georgiev. A. (Антонова В., Георгиев А.) (2013). *Проучване на дигиталните медии: България*. Доклад на Фондация „Отворено Общество”. [Prouchvane na digitalnite medii: Bŭlgariya. Doklad na Fondatsiya „Otvoreno Obshtestvo”]. (Country Report: Digital Media Survey: Bulgaria). Report of the Open Society Foundation. <https://www.opensocietyfoundations.org/uploads/49434832-d084-45c5-9121-783469aa6a14/mapping-digital-media-bulgaria-bg-20130805.pdf>

<https://apis.bg/bg/>

Arnaudov, Y. (Арнаутов, Й.) (02.08.2020 г.). *На прага на 5G ерата - телекомуникационният пазар в България през 2020 г.* [Arnaudov, Y. Na praga na 5G epokhata – telekom pazarŭt vŭlgariya prez 2020]. (Arnaudov, Y. On the Threshold of the 5G Era - the Telecom Market in Bulgaria in 2020). <https://www.techtrends.bg/2021/08/02/bulgaria-telecom-market-2020-11047/>

Arnaudov Y. (Арнаутов, Й.) (28.10.2019 г.). *PPF Group придобива собственост на bTV – SME за 1,9 млрд.евро*. (Arnaudov, Y. PPF Group pridobiva sobstvenika na bTV – SME za 1,9 mlrd.evro). (PPF Group Acquires the Owner of bTV - SME for 1.9 Billion Euros). <https://www.techtrends.bg/2019/10/28/ppf-group-cme-deal-4368/>

Association of Bulgarian Radio and Television Operators <https://www.abbro-bg.org/>

Association of the European Journalists–Bulgaria (AEJ). *Journalism without Masks*. Annual Report on Media. <https://us4bg.org/bg/projects/%d0%b0%d0%b5%d0%b6-%d0%b1%d1%8a%d0%bb%d0%b3%d0%b0%d1%80%d0%b8%d1%8f/>

Bill (Законопроект за изменение и допълнение на Закона за радиото и телевизията), внесен в НС на 19.03.2020 г., [Zakonoprojekt za izmeneneie I dopulnenie na Zakona za radioto I televiziata, vnesen v NS na 19.03.2020]. (Bill for Amendment and Supplement of the Radio and Television Act Introduced in the National Assembly on 19.03.2020). <https://www.parliament.bg/bills/44/054-01-25.pdf>

Bill (Проект на Закон за допълнение на Закона на защита на личните данни, внесен в НС на 28.05.2020 г.) [Proekt na zakon za dopalnenie na Zakona za lichnite dannii, vnesen v NS on 28.05.2020]. (Bill for the Supplement of the Personal Data Protection Act, Introduced in the National Assembly on 28.05.2020) <https://www.parliament.bg/bills/44/054-01-47.pdf>.

Branch Association of Bulgarian Telecommunication Operators <https://babto.bg/>

Bulgarian Center for Non-Profit Law (Български център за нестопанско право). (2020). *Права по време на криза #1*. [Bŭlgarski tsentŭr za nestopansko pravo. (2020). Prava po vreme na kriza #1]. (Bulgarian Center for Non-Profit Law. Rights in Times of Crisis #1). <http://bcnl.org/news/prava-po-vreme-na-kriza.html>

Bulgarian Helsinki Committee (Български Хелзинкски комитет). (2020). *Правата на човека в България през 2020 г.* [Balgarski Helsinski Komitet. Pravata na choveka v Bulgaria prez 2020 g.] (Bulgarian Helsinki Committee. Human Rights in Bulgaria in 2020). <https://www.bghelsinki.org/web/files/reports/147/files/BHC-Human-Rights-in-Bulgaria-in-2020-pdf>

Bulgarian National Radio. <https://bnt.bg/ombudsman>

- BNR Report (2021-2022). <https://bnr.bg/files/uploads/Otchet%201%20final.pdf>
- Center for liberal strategies (2017). Доклад 10 години България в ЕС. [*Doklad 10 godini Bŭlgariya v ES*]. Report 10 years of Bulgaria in the EU. <https://www.europarl.europa.eu/bulgaria/resource/static/files/bulgaria-10-years-in-the-eu-report.pdf>
- Center for Safe Internet, National Representative Survey "Children of Bulgaria Online", 2016, <https://www.safenet.bg/images/sampledata/files/DML-BG.pdf>
- Cholakov, R. (Чолаков, Р.) (2010). Закон за печата беше едно от табутата на българското медийно законодателство. [Cholakov, R. Zakon za pechata beshe edno ot tabutata na bŭlgarskoto mediino zakonodatelstvo]. (Cholakov R. The Law on the Press Was One of the Taboos of the Bulgarian Media Legislation). <https://www.moreto.net/novini.php?n=86284>
- Ciela Norma AD. <https://www.ciela.net/>
- Coalition for Media Literacy (2021). Медиите, родителите и развитието на децата. Аналитичен доклад. [Mediite, roditelite i razvitiето na detsata. Analitichen doklad]. (Media, Parents and Children's Development. Analytical Report). <https://gramoten.li/wp-content/uploads/2021/07/%D0%9C%D0%B5%D0%B4%D0%B8%D0%B8%D1%82%D0%B5-%D1%80%D0%BE%D0%B4%D0%B8%D1%82%D0%B5%D0%BB%D0%B8%D1%82%D0%B5-%D0%B8-%D1%80%D0%B0%D0%B7%D0%B2%D0%B8%D1%82%D0%B8%D0%B5%D1%82%D0%BE-%D0%BD%D0%B0-%D0%B4%D0%B5%D1%86%D0%B0%D1%82%D0%B0-%D0%90%D0%BD%D0%B0%D0%BE%D0%B8%D1%82%D0%B8%D1%87%D0%B5%D0%BD-%D0%B4%D0%BE%D0%BA%D0%BB%D0%B0%D0%B4.pdf><https://www.newmedia21.eu/analizi/aktualni-aspekti-na-medijnata-konvergentsiya/>
- Commission for Personal Data Protection (CPDP) <https://www.cdpd.bg/en/>
- Commission for the Protection against Discrimination (CPD) <https://kzd-nondiscrimination.com/layout/>
- Commission of the European Communities. (Комисия на европейските общности). (9.10. 2002). Работен доклад за напредъка на Република България в процеса на присъединяване. [Komisiya na Evropeiskite obshtnosti Redoven doklad za napredŭka na Republika Bŭlgariya v protsesa na prisŭedinyavane]. (Commission of the European Communities. Regular Report on the Progress of the Republic of Bulgaria in the Accession Process). [file:///C:/Documents%20and%20Settings/lili/My%20Documents/Downloads/rr\\_2002.pdf](file:///C:/Documents%20and%20Settings/lili/My%20Documents/Downloads/rr_2002.pdf)
- Constitutional Court journal <https://www.constcourt.bg/bg/Magazines>
- Constitutional Court of Bulgaria. <https://www.constcourt.bg/bg/Home/Home>
- Council for Electronic Media (CEM) <https://www.cem.bg/>
- Council for Electronic Media (Съвет за електронни медии). Поименно разпределение на собствеността в електронните медии. [Poimenno razpredelenie na sobstvenostta v elektronnite medii]. (Name Distribution of Ownership in the Electronic media). <https://www.cem.bg/infobg/33> <https://www.cem.bg/infobg/33>
- Council of Europe (2016). Recommendation CM/Rec(2016)4[1] of the Committee of Ministers to Member States on the Protection of Journalism and Safety of Journalists and Other Media Actors. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016806415d9#\\_ftn1](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016806415d9#_ftn1)
- Council of Europe. Swiss Institute for Comparative Law (2016). Internet Filtering, Blocking and Take Down of Content. Report about Bulgaria. <http://www.coe.int/en/web/freedom-expression/country-reports>.
- Danov, D. (Данов, Д.) (2020) Медийна грамотност: Преосмисляне на опита. София: Софийски университет "Св. Климент Охридски". [Danov, D. Mediinata gramotnost: preosmislyane na opita]. (Danov, D. Media Literacy: Rethinking Experience). Sofia: The St. Kliment Ohridski Sofia University.
- Data/BIRD <https://bird.bg/>

- Daulova, T. (2021). Models for Building Virtual Communities from Online Media. Dissertation Abstract. University of National and World Economy. Faculty of Economics of Infrastructure. Department of Media and Public Communications - <https://konkursi.unwe.bg/GraduatedCompetitors/GetDocument/42>.
- Dichev I., Spasov O., Angelova V., Daskalova N., Nejkova M., Dimitrova V., Germanova N., Dimov V., Popova Z., Elenkov I., Smilova R., Grigorova M., Mandichev G., Sharankova D., Simeonova K., Rangelova A. (2009). Novite mladi i novite medii. (The New Young and the New Media). Sofia: Open Society Institute. [https://osis.bg/wp-content/uploads/2018/04/OSI\\_Publication\\_Public\\_debate\\_3.pdf](https://osis.bg/wp-content/uploads/2018/04/OSI_Publication_Public_debate_3.pdf)
- Dimitrov, V. (Димитров, В.) (2019). Възможно ли е журналистиката да бъде превърната в регулирана професия чрез специален закон? В: *Индустриални отношения и обществено развитие*. [Dimitrov V. Vŭzmozno li e zhurnalistikata da būde prevŭrnata v regulirana profesiya chrez spetsialen zakon? V: *Industrialni otnosheniya i obshtestveno razvitie*]. (Dimitrov V. Is It Possible to Turn Journalism into a Regulated Profession through a Special Law? In: *Industrial Relations and Social Development*, No 1, pp. 19-27.
- Dobek-Ostrowska B. (2015), 25 Years after Communism: Four Models of Media and Politics in Central and Eastern Europe. In: Dobek-Ostrowska, B. and Głowacki, M. (eds.). *Democracy and Media in Central and Eastern Europe 25 Years on*. Wrocław, Pl: Peter Lang Edition.)
- Drumeva, E. (Друмевa, Е.) (2013). *Конституционно право*. София: Сиела Норма. [*Konstitutsionno parvo*. Sofiya: Siela Norma]. (*Constitutional Law*. Sofia Siela Norma).
- DW Bulgaria. (Дойче Веле България). (2015). Да „превземеш“ медийно държавата. 12 март 2015. [Doiche Vele Bŭlgariya. Da „prevzemesh“ mediino dŭrzhavata]. (DW Bulgaria. To „take-over“ the state by media. <https://www.dw.com/bg/%D0%B4%D0%B0-%D0%BF%D1%80%D0%B5%D0%B2%D0%B7%D0%B5%D0%BC%D0%B5%D1%88-%D0%BC%D0%B5%D0%B4%D0%B8%D0%B9%D0%BD%D0%BE-%D0%B4%D1%8A%D1%80%D0%B6%D0%B0%D0%B2%D0%B0%D1%82%D0%B0/a-18309362>
- European Commission. (2021). *E-Government Benchmark 2021*. <https://digital-strategy.ec.europa.eu/en/library/egovernment-benchmark-2021>
- European Commission (Eurostat). (29 October 2021). *How Digitalised Are EU's Enterprises?* <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20211029-1>
- European Commission. (2021). *Standard Eurobarometer: Report 92: Media Use in the European Union*. <https://op.europa.eu/en/publication-detail/-/publication/d2dbcf78-11e0-11ec-b4fe-01aa75ed71a1>
- European Commission (2020). *European Democracy Action Plan: Making EU Democracies Stronger*. [file:///C:/Documents%20and%20Settings/lili/My%20Documents/Downloads/European\\_Democracy\\_Action\\_Plan\\_making\\_EU\\_democracies\\_stronger.pdf](file:///C:/Documents%20and%20Settings/lili/My%20Documents/Downloads/European_Democracy_Action_Plan_making_EU_democracies_stronger.pdf)
- Eurostat. (3. 05. 2021). *Journalism and Publishing Activities in EU*. <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/edn-20210503-1?redirect=%2Feurostat%2F>
- E-vestnik team (Екип на e-vestnik). (2021). *Най-четените медии в българския интернет 2021 г. – класация и справка кой кой е*. [Ekip na e-vestnik. (2021). *Naŭ-chetenite medii v bŭlgarskiya internet 2021 g. – klasatsiya i spravka koŭ koŭ e*]. E-vestnik team. (2021). *The Most Read Media on the Bulgarian Internet in 2021 - Ranking and Who's Who*. <https://e-vestnik.bg/33634/nay-chetenite-medii-v-balgarskia-internet-2021-g-klasatsia-i-spravka-koy-koy-e/>
- Fileva P., L. Stoikov, M. Nejkova et al (Филева П., Л. Стойков, М. Нейкова и др.) (2010). *Журналистически професии. Статукво и динамика в България*. София: Софийски университет "Св. Климент Охридски" [*Zhurnalisticheski profesii. Statukvo i dinamika v Bŭlgariya*. Sofiya: Sofiŭski universitet "Sv. Kliment Okhridski"]. (*Journalism Professions. Status Quo and Dynamics in Bulgaria*. Sofia: The St. Kl. Ochridsky Sofia University.
- Foundation "National Council for Journalistic Ethics". <https://mediaethics-bg.org/%d0%b5%d1%82%d0%b8%d1%87%d0%b5%d0%bd-%d0%ba%d0%be%d0%b4%d0%b5%d0%ba%d1%81-2/>.

- Foundation Radostina Konstantinova). <https://radostinakonstantinova.org/Freedom in Bulgaria. https://aej-bulgaria.org/wp-content/uploads/2020/> [in Bulgarian]
- Free Europe (Свободна Европа). (28.09.2021). *Репортери без граници призоваха България да гарантира свободата на словото преди предстоящите избори.* [Svobodna Evropa. *Reporteri bez granitsi prizova Bŭlgariya da garantira svobodata na slovoto predi predstoyashtite izbori.* (Free Europe: *Reporters without Borders Called on Bulgaria to Guarantee Freedom of Speech ahead of the Upcoming Elections*). <https://www.svobodnaevropa.bg/a/31481454.html>
- Georgieva-Stankova, N. (2011). The “new” Bulgarian media – development trends and tendencies. Media regulation, ownership, control and the “invisible hand of the market”. *Trakia Journal of Sciences*, Vol. 9, Suppl. 3, pp 191-203, Trakia University, Stara Zagora. [https://www.academia.edu/3065709/The\\_New\\_Bulgarian\\_Media\\_Development\\_Trends\\_and\\_Tendencies\\_Media\\_Regulation\\_Ownership\\_Control\\_and\\_The\\_Invisible\\_Hand\\_of\\_the\\_Market](https://www.academia.edu/3065709/The_New_Bulgarian_Media_Development_Trends_and_Tendencies_Media_Regulation_Ownership_Control_and_The_Invisible_Hand_of_the_Market)
- Hofstede G., Hofstede G. J., Minkov M. (2010). *Cultures and Organizations. Software of the Mind. Intercultural Cooperation and Its Importance for Survival.* New York: McGraw Hill.
- Hristova, H. (Христова, Х.) (17.11.20210). Пандемията сви рекламния пазар до 455 млн. лв. през 2020 г., но спадът вече е преодолян. В: Капитал (Медии и реклама). [Hristova, H. *Pandemiayata svi reklamniya pazar do 455 mln.lv prez 2020, no spadŭt veche e preodolyan. V: Kapital [Medii i reklama].* (Hristova, H. *The Pandemic Shrank the Advertising Market to BGN 455 Million in 2020, but the Drop Has Already Been Overcome.* In: *Capital [Media and Advertising].* [https://www.capital.bg/biznes/media\\_i\\_reklama/2021/11/17/4281788\\_pandemiyata\\_svi\\_reklamniya\\_pazar\\_do\\_455\\_mln\\_lv\\_prez/](https://www.capital.bg/biznes/media_i_reklama/2021/11/17/4281788_pandemiyata_svi_reklamniya_pazar_do_455_mln_lv_prez/)
- Human Development Index (2022). <https://worldpopulationreview.com/country-rankings/hdi-by-country>
- 2022 Index of Economic Freedom. (2022). Bulgaria. <https://www.heritage.org/index/country/bulgaria>
- Indzhov, I. (Инджов, И.) (2014). Темите “табу” в българските онлайн медии. Институт за модерна политика и Friedrich Naumann Stiftung [Indzhov, I. *Temite “tabu” v bulgarskite onlain medii.* (Indzhov, I. *“Taboo” Topics in Bulgarian Online Media.* Institute for Modern Policy and Friedrich Naumann Stiftung <https://www.modernpolitics.org/wp-content/uploads/IMP-report-taboo-topics-260614.pdf>
- Institute for Modern Politics (Институт за модерна политика) (2014). [Institut za moderna politika]. Доклад Темите табу в българските онлайн медии-2014. [Doklad – Temite tabu v bŭlgarskite onlain medii – 2014]. Report *Taboo Topics in the Bulgarian Online Media – 2014*). <https://www.modernpolitics.org/3988/%d0%b4%d0%be%d0%ba%d0%bb%d0%b0%d0%b4-%d1%82%d0%b5%d0%bc%d0%b8%d1%82%d0%b5-%d1%82%d0%b0%d0%b1%d1%83-%d0%b2-%d0%b1%d1%8a%d0%bb%d0%b3%d0%b0%d1%80%d1%81%d0%ba%d0%b8%d1%82%d0%b5-%d0%be%d0%bd/>
- Interactive Advertising Bureau. <https://iabbg.net/za-iab-bulgaria/>
- IRES. Media Sustainability Index (MSI). <https://www.irex.org/resource/media-sustainability-index-msi#europe-eurasia>
- Jakubowicz, Karol Sŭkósd M. 2008: *Finding the Right Place on the Map: Prospects for Public Service Broadcasting in Post-Communist Countries.* // *Finding the Right Place on the Map. Central and Eastern European Media Change in a Global Perspective.* Bristol, UK: Intellect., p.29
- Kashŭmov, A. (Кашъмов, А.) (2004). Някои въпроси при делата за обида и клевета и делата за достъп до обществена информация. Сп. Правата на човека. N4. [Kashŭmov, A. *Nyakoï vŭprosi pri delata za obida i kleveta i delata za dustup do obshtestvena informatsiya. Pravata na choveka.*]. (Kashŭmov, A.). *Some Issues in Insult and Defamation Cases and Cases for Access to Public Information.* In: *Human Rights*, N0 4. <https://humanrights.bg/Media/Default/Documents/Statii/%20analizi/%D0%94%D0%B5%D0%BB%D0%B0%20%D0%B7%D0%B0%20%D0%BE%D0%B1%D0%B8%D0%B4%D0%B0%20%D0%B8%20%D0%BA%D0%BE%D0%B5%D0%B2%D0%B5%D1%82%D0%B0%20%D0%B8%20%D0%B4%D0%BE%D1%81%D1%82%D1%8A%D0%BF%20%D0%B4%D0%BE%20%D0%B8%D0%BD%D1%84%D0%BE%D1%80%D0%BC%D0%B0%D1%86%D0%B8%D1%8F.pdf>
- Kirilova, M. (Кирилова, М.) (2019). Актуални аспекти на медийната конвергенция. [Kirilova M. *Aktualni aspekti na mediinata konvergentsiya.*]. (Kirilova M. *Current Aspects of Media Conver-*



- gence). [Newmedia21. https://www.newmedia21.eu/analizi/aktualni-aspekti-na-medijnata-konvergentsiya/](https://www.newmedia21.eu/analizi/aktualni-aspekti-na-medijnata-konvergentsiya/)
- Koleva, M. (2018). Analysis of Networks of Influence: Personalities in the Media Coverage of Global Issues ((2013 and 2017). Dissertation Abstract. Sofia University "St. Kliment Ohridski".
- Konrad Adenauer Foundation. Media Program for Southeast Europe. (Фондация „Конрад Аденауер“. Медийна програма за Югоизточна Европа). <https://www.kas.de/bg/web/bulgarien>
- Konrad Adenauer Foundation. (Фондация „Конрад Аденауер“). (2020). *Нагласи на българските граждани по теми, свързани с медиите*. Изследване на Фондация „Конрад Аденауер“, Медийна програма за Югоизточна Европа и „Тренд“. [Naglasi na bulgarskite grazhdani po temi, svürzani s mediite. Izsledvane na Fondatsiya „Konrad Adenauer“, Mediina programa za Yugoiztochna Evropa i „Trend“]. (Attitudes of Bulgarian Citizens on Topics Related to Media. Study by Konrad Adenauer Foundation, Media Program for Southeast Europe and Trend.) [https://www.kas.de/documents/281902/281951/Survey+findings+2020+\(presentation\)+BG.pdf/3869f3bd-4757-1dc3-d081-fa574ed4fd26?version=1.0&t=1607938230555](https://www.kas.de/documents/281902/281951/Survey+findings+2020+(presentation)+BG.pdf/3869f3bd-4757-1dc3-d081-fa574ed4fd26?version=1.0&t=1607938230555)
- Konrad Adenauer Foundation. Media program for Southeast Europe. (Фондация „Конрад Аденауер“. Медийна програма за Югоизточна Европа). (2018). *Доверието в медиите остава слабо*. [Doverieto v mediite ostava slabo] (Trust in Media Remains Weak). [https://www.kas.de/c/document\\_library/get\\_file?uuid=3794095c-32b2-c4d4-63e8-e1c5ba9886b3&groupId=281902](https://www.kas.de/c/document_library/get_file?uuid=3794095c-32b2-c4d4-63e8-e1c5ba9886b3&groupId=281902)
- Konstantinova, S. (Константинова, С.) (2012) (съставител и научен ръководител) [sustavitel i nauchen rukovoditel]. (editor and supervisor). *Трансформации на журналистическата професия. Теория и практика в онлайн среда*. [Transformatsii na zhurnalisticheskata profesiya. Teoriya i praktika v onlain sreda]. (Transformations of the Journalistic Profession. Theory and Practice in an Online Environment) София: Сиела. (Sofia: Ciela.)
- Konstantinova, S. (Константинова, С.). (2011). Приложни аспекти на обучението по онлайн медии. В: *Взаимодействието теория-практика: ключови проблеми и решения*. [Prilozhni aspekti na obuchenieto po onlain medii. In: Vzaimodeistviето teoriya-praktika: klyuchovi problemi i resheniya]. (Applied Aspects of Online Media Training. In: Theory-Practice Interaction: Key Problems and Solutions.) Т. 4. БСУ, с. 150-154. (V. 4. BSU, pp. 150-154.).
- Kostova, M. (Костова, М.) (2022). Доклад: *България е пример за непрозрачно финансиране на медиите*. Българско национално радио, 6 април 2022. [Kostova M. Doklad: Bŭlgariya e primer za neprozrachno finansirane na mediite. Bŭlgarsko natsionalno radio]. (Kostova, M. A Report: Bulgaria is an example for a non-transparent media financing. Bulgarian National Radio). Kostova, M. Doklad: Bŭlgariya e primer za neprozrachno finansirane na mediite. Bŭlgarsko natsionalno radio, 6 april 2022.]. <https://bnr.bg/horizont/post/101627870/doklad-balgaria-e-primer-za-neprozrachno-finansirane-na-mediite>
- Lash Scott. (2004). *Criticism of Information*. Sofia: Kota Publishing House, p. 181.
- Lesenski, M. (Лесенски, М.). (2021). *Индекс на медийната грамотност 2021. Двойна заплаха: Устойчивост на фалшиви новини по време на „инфодемията“ от Ковид-19*. [Indeks na mediinata gramotnost 2021. Dvoina zaplaxa: Ustoichivost na falshivi novini po vreme na „infodemiya“ ot Kovid-19.]. (Media Literacy Index 2021. Double Threat: Resistance to Fake News during the "Infodemia" by Covid-19). Open Society Institute. [https://osis.bg/wp-content/uploads/2021/03/MediaLit%D0%B5racyIndex2021\\_BG.pdf](https://osis.bg/wp-content/uploads/2021/03/MediaLit%D0%B5racyIndex2021_BG.pdf)
- LEX.BG. Bulgarian Legal Portal. <https://www.facebook.com/LEX.BG/>
- Lyubenova, N. (Любенова, Н.). (2016). *Медийният избор на аудиторията. Препоръки за маркетингова политика в качествена медия*. Автореферат. Софийски университет "Св. Климент Охридски". [Mediiniyat izbor na auditoriyata. Preporŭki za marketingova politika v kachestvenata mediya. Avtoreferat. Sofiiski universitet "Sv. Kliment Okhridski"]. (The Media Choice of the Audience. Marketing Policy Recommendations in Quality Media. Abstract. The St. Kliment Ohridski Sofia University). <http://digilib.nalis.bg/dspviewerb/srv/viewer/bul/14c77e8e->

[43de-4ca2-ad85-806f7ca73e56?tk=FMD-jkPeTKKthYBvfKc-VgAAAAABhXMIk.FGOTKHUCIU6cGLhXtwjroQ&citation\\_url=/xmlui/handle/nls/26794](https://doi.org/10.43de-4ca2-ad85-806f7ca73e56?tk=FMD-jkPeTKKthYBvfKc-VgAAAAABhXMIk.FGOTKHUCIU6cGLhXtwjroQ&citation_url=/xmlui/handle/nls/26794)

Media and Public Relations <http://media-journal.info/?p=project>

MEDIADEM EU research project. <https://www.mediadem.eliamep.gr>

Media Democracy Foundation (Фондация „Медийна демокрация“). [www.fmd.bg/?cat=4](http://www.fmd.bg/?cat=4)

*Media, Parents and Children's Developments*. Analytical Report. *Медиите, родителите и развитието на децата*. Аналитичен доклад (2021). [*Mediite, roditelite i razvitiето na detsata*. Аналитичен доклад]. (*Media, Parents and Children's Developments*. Analytical Report.). <https://gramoten.li/wp-content/uploads/2021/07/%D0%9C%D0%B5%D0%B4%D0%B8%D0%B8%D1%82%D0%B5-%D1%80%D0%BE%D0%B4%D0%B8%D1%82%D0%B5%D0%BB%D0%B8%D1%82%D0%B5-%D0%B8-%D1%80%D0%B0%D0%B7%D0%B2%D0%B8%D1%82%D0%B8%D0%B5%D1%82%D0%BE-%D0%BD%D0%B0-%D0%B4%D0%B5%D1%86%D0%B0%D1%82%D0%B0-%D0%90%D0%BD%D0%B0%D0%BB%D0%B8%D1%82%D0%B8%D1%87%D0%B5%D0%BD-%D0%B4%D0%BE%D0%BA%D0%BE%D0%B0%D0%B4.pdf>

Ministry of Culture <https://mc.government.bg/index.php?l=1> .

Minev, D., Kabakchieva, P. (Минев, Д., Кабакчиева, П.) (1996). *Преходът - елити и стратегии*. София: Университетско издателство "Св. Климент Охридски". [Minev D., Kabakchieva, P. *Prekhodŭt - eliti i strategii*]. (Minev, D., Kabakchieva, P. *The Transition – Elites and Strategies*. Sofia University "St.Kliment Ohridsky" Publishing House)

Ministry of Culture. <http://mc.government.bg/page.php?p=46&s=13&sp=699&t=0&z=0>

Ministry of Culture. *Register* Министерство на културата. *Регистър на данни за собствеността на печатни издания*. [Ministerstvo na kulturata. *Registŭr na danni za sobstvenostta na pechatni izdaniya*]. (Ministry of Culture. *Register of Data on the Ownership of Printed Publications*). [http://www.publicregisters.info/r/Registyr\\_na\\_danni\\_za\\_sobstvenostta\\_na\\_pe/107407/](http://www.publicregisters.info/r/Registyr_na_danni_za_sobstvenostta_na_pe/107407/) National Statistical Institute (2022). Population by districts, municipalities, place of residence and sex. National Statistical Institute (2020). *Culture*. <https://www.nsi.bg/en/content/3552/culture> <https://www.nsi.bg/en/content/2975/population-districts-municipalities-place-residence-and-sex>

Ministry of Education and Science. (Министерство на образованието и науката). (2021). *Рейтингова система на висшите училища в страната*. [Ministerstvo na obrazovaniето i naukata. [Ministry of Education and Science (2021). *Reitingova sistema na visshite uchilishta v strana-ta*]. (Ministry of Education and Science. *Rating System of Higher Education Institutions in the Country*. <https://rsvu.mon.bg/rsvu4/#/methodology>

Ministry of Foreign Affairs of the Republic of Bulgaria <https://www.mfa.bg/en/>

Ministry of Transport, Information Technology and Communications (MTITC) <https://www.mtc.government.bg/>

National Council for Journalistic Ethics Foundation <https://mediaethics-bg.org>

National Statistical Institute <https://www.nsi.bg/en>

National Statistical Institute (2020). *Employed in Enterprises*. <https://www.nsi.bg/en/content/8214/employed-enterprises>

National Statistical Institute. *Enrolled students by educational degree and fields of education*. <https://www.nsi.bg/bg/content/3392/>

National Statistical Institute. (Национален статистически институт) (2020). *Статистически справочник* [*Statisticheski spravochnik*]. (*Statistical Reference Book*). <https://www.nsi.bg/sites/default/files/files/publications/StatBook2020.pdf>

National Statistical Institute (2021). *Students by Educational-Qualification Degree and Narrow Field of Education*. <https://www.nsi.bg/en/content/3392/students-educational-qualification-degree-and-narrow-field-education>

Newmedia21 <http://www.newmedia21.eu>

Nielsen Admosphere Bulgaria <https://en.nielsen-admosphere.bg/>

- Nieslen Admosphere. (2021). Месечен бюлетин. [Mesechen byuletin]. (Monthly bulletin). (04/2021), (05/2021), (06/2021). <https://www.nielsen-admosphere.bg/products-and-services/tv-audience-measurement-in-bulgaria/audience-results/>
- Nielsen Online. (Нилсън Онлайн). (2011). *Класация на българските сайтове по Нилсън Онлайн за месец август 2011 година*. [Klasatsiya na bŭlgarskite saĭtove po Nilsŭn Onlajn za mesets avgust 2011 godina]. (Ranking of Bulgarian Sites by Nilsson Online for August 2011). <https://obuch.info/klasaciya-na-blgarskite-sajtove-po-nilsn-onlajn-za-mesec-avgus.html>
- Nielsen Online. (Нилсън Онлайн). (2009). *Данни за интернет трафик и аудитория за ноември от Нилсън Онлайн*. [Danni za internet trafik i auditoriya za n. noemvri ot Nilsŭn Onlajn]. (Internet Traffic and Audience Data for November by Nilsson Online.) <https://interactive-share.com/blog/%D0%B4%D0%B0%D0%BD%D0%BD%D0%B8-%D0%B7%D0%B0-%D0%B8%D0%BD%D1%82%D0%B5%D1%80%D0%BD%D0%B5%D1%82-%D1%82%D1%80%D0%B0%D1%84%D0%B8%D0%BA-%D0%B8-%D0%B0%D1%83%D0%B4%D0%B8%D1%82%D0%BE%D1%80%D0%B8%D1%8F-%D0%B7-3/>
- Nielsen Online. (Нилсън Онлайн). (2008). *Класация на българските сайтове*. [Klasatsiya na bŭlgarskite saĭtove]. (Ranking of Bulgarian Sites.) <http://info.netinfocompany.bg/news/klasaciia-na-bylgarskite-sajtove--184?page=1>
- Nielsen Online. (2008). *Ranking of Bulgarian sites*. <http://info.netinfocompany.bg/news/klasaciia-na-bylgarskite-sajtove--184?page=1>
- Nikolova, R. (Николова, Р.) (2010). Конституционноправни аспекти на свободата в медийната дейност. В: *Правен преглед*, год V. [Konstitutsionnopravni aspekti na svobodata v mediĭnata deĭnost. V: *Praven pregled*, god V]. (Constitutional Aspects of Freedom in Media Activity. In: *Legal review*, year V).
- Nikolova, R. (Николова, Р.) (2004). Намесата на медиите в личния живот на гражданите. В: *Съвременно право*, № 4. [Namesata na mediite v lichnia zhivot na grazhdanite. Namesata na mediite v lichnia zhivot na grazhdanite. V: *Sŭvremenno pravo*, № 4]. (The Interference of the Media in the Private Life of Citizens. In: *Contemporary Law*, No. 4).
- OFCOM. The Future of Media Plurality in the UK (Report). 17 November 2021. [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0019/228124/statement-future-of-media-plurality.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0019/228124/statement-future-of-media-plurality.pdf)
- Ognyanova, N. (Огнянова, Н.) (2019). *Купуването на медии. Как може журналистиката да се осигури с пари от еврофондовете* [Ognyanova, N. *Kupuvaneto na medii. Kak s pari ot evrofondove mozhe da se osiguri porŭchkova zhurnalistika*]. (N. *Buying Media. How Can Journalism Be Provided with Money from EU Funds?*. Free Europe - Bulgaria. <https://www.svobodnaevropa.bg/a/30047591.html>
- Open Society Foundation (Фондация „Отворено общество“). <https://osis.bg/?p=664>
- Open Society Institute – Sofia. (2011). *Annual Report*. [https://osis.bg/wp-content/uploads/2018/04/Annual\\_Report\\_2011\\_BG\\_Ed.pdf](https://osis.bg/wp-content/uploads/2018/04/Annual_Report_2011_BG_Ed.pdf)
- OSIS. (2021). Media Literacy Index 2021. *Double Trouble: Resilience to Fake News at Time of Covid-19 Infodemic*. [https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021\\_ENG.pdf](https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021_ENG.pdf)
- Pavlova, I. (Павлова, И.). (2012). *Да споделяш в облаците. Новите медии и журналистиката*. [Da spodelyash v oblatsite. Novite medii i zhurnalistikata] (To Share in the Clouds. New Media and Journalism). Велико Търново: Фабер. (Veliko Turnovo: Faber).
- Penkova, S. (Пенкова, С.) (2021). Телевизията остава най-предпочитаната медия сред българите. [Televiziyata ostava naĭ-predpochitanata mediya sred bŭlgarite]. (Television Remains the Most Preferred Media among Bulgarians.) [https://www.capital.bg/biznes/media\\_i\\_reklama/2021/05/12/4208660\\_televiziiata\\_ostava\\_na\\_i-predpochitanata\\_media\\_sred/#](https://www.capital.bg/biznes/media_i_reklama/2021/05/12/4208660_televiziiata_ostava_na_i-predpochitanata_media_sred/#)
- Pesheva, M. (Пешева, М.) (2011). Радио и Телевизионната среда 2001–2010. [Radio i Televizionnata sreda 2001–2010]. (Radio and Television Environment 2001–2010). Велико Търново: „Фабер“ (Veliko Turnovo: Faber)

- Pesheva, M., Petrov, M., Raycheva, L. (editors). (Пешева, М., Петров, М., Райчева, Л. (съставители). (2011). *Радиосредата 2001-2010*. [Radiosredata 2001-2010]. (The Radio Environment 2001-2010) Велико Търново: „Фабер“ (Veliko Turnovo: Faber)
- Pesheva, M., Petrov, M., Raycheva, L. (editors). (Пешева, М., Петров, М., Райчева, Л. (съставители). (2011). *Телевизионната среда 2001-2010*. [Televizionnata sreda 2001-2010]. (The Television Environment 2001-2010). Велико Търново: „Фабер“ (Veliko Turnovo: Faber)
- Postmodernism Problems <https://pmpjournal.org/index.php/pmp>
- Publicis Groupe. <https://www.publicisgroupe.com/fr/splash>
- Raycheva, L. (Райчева, Л.) (2014). *Медиатизация на политиката VS политизация на медиите в ситуацията на предизборна кампания*. В: Крумов К., М. Каменова, М. Радович-Маркович (съставители). *Личност и общество: предикателствата на промяната*. [Raycheva, L. *Media-tizatsiya na politikata VS politicizatsiya na mediite v situatsiyata na predizborna kampaniya*. V: Krumov K., M. Kamenova, M. Radovich-Markovich (sustaviteli). *Lichnost i obshtestvo: predizvikelstvata na promyanata*]. [Raycheva, L. *Mediaization of Politics VS Politicization of Media in the Situation of the Election Campaign*. In: Krumov K., M. Kamenova, M. Radovic-Markovic (eds). *Personality and Society: the Challenges of Change*. Sofia: Bulgarian Academy of Sciences and Arts, Serbian Royal Academy of Sciences and Arts, European Center of Business, Education and Science, pp. 75-98.
- Raycheva, L. (Райчева, Л.) (2013). *Феноменът телевизия - трансформация и предизвикателства*. София: Тип-топ прес. [Raycheva, L. *Fenomenit televiziya - transformatsiya i predizvikelstva*]. Raycheva, L. (2013). (The Phenomenon of Television - Transformation and Challenges. Sofia. Tip-top Press)
- Redlink.bg team (Екип на redlink.bg) (2021). *Медиите през 2021 – възход на „домашните“ медии*. [Ekip na redlink.bg (2021). *Mediite prez 2021 – vuzkhod na „domashnite“ medii*] (The Media in 2021 - the Rise of "Home" Media) <https://redlink.bg/mediite-prez-2021-%E2%80%93-vazhod-na-domashnite-medii-195news.html>
- Reporters without Borders. <https://rsf.org/en/bulgaria>
- Reporters without Borders (2020). *Press Freedom Index*. <https://rsf.org/en/world-press-freedom-index>
- Reporters without Borders. SLAPP. <https://rsf.org/en/bulgaria-alarming-slapp-cases-endanger-fragile-media-freedom>
- Rhetoric and Communications <https://rhetoric.bg/>
- Reuters Institute. Bulgaria. <https://www.reuters.com>
- Reuters Institute. (2021). *Digital News Report. Данни на България (Data for Bulgaria)*. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/bulgaria>
- Sarakinov G. (Саракинов Г.). (2013). *Авторско право и сродните му права в Република България*. София: Сиби. [Sarakinov, G. *Avtorsko pravo i srodnite mu prava v Republika Bŭlgariya*. Sofia: Sibi]. (Sarakinov, G. *Copyright and Related Rights in the Republic of Bulgaria*. Sofia: Sibi).
- Slavcheva-Petkova Vera (2017). *Journalists in Bulgaria. A Country Report*. In: *Worlds of Journalism Study*. [https://epub.ub.uni-muenchen.de/36881/7/Country\\_report\\_Bulgaria.pdf](https://epub.ub.uni-muenchen.de/36881/7/Country_report_Bulgaria.pdf)
- Smilova R., Smilov D., Ganev G. (2011). *Case study report. Does media policy promote media freedom and independence? The case of Bulgaria*. Centre for Liberal Strategies (CLS). [https://www.academia.edu/8760427/Case\\_study\\_report\\_Does\\_media\\_policy\\_promote\\_media\\_freedom\\_and\\_independence\\_The\\_case\\_of\\_Bulgaria\\_Ruzha\\_Smilova\\_Daniel\\_Smilov\\_Georgy\\_Ganev\\_Centre\\_for\\_Liberal\\_Strategies\\_CLS\\_MEDIADDEM?email\\_work\\_card=reading-history](https://www.academia.edu/8760427/Case_study_report_Does_media_policy_promote_media_freedom_and_independence_The_case_of_Bulgaria_Ruzha_Smilova_Daniel_Smilov_Georgy_Ganev_Centre_for_Liberal_Strategies_CLS_MEDIADDEM?email_work_card=reading-history).
- Spasov O., N. Daskalova, V. Georgieva (Спасов О., Н. Даскалова, В. Георгиева). (2017). *Да бъдеш журналист. Състояние на професията*. [Da badesh journalist. Sastryanie na profesiyata]. (Being Journalist: The Status Quo of the Profession). Association European Journalists&Media De-

- mocracy Foundation, Sofia, 2017. <http://fmd.bg/wp-content/uploads/2017/10/JournalistProfessionBG2017.pdf>
- Spasov, O., Ognyanova, N., Daskalova, N. (2016). Monitoring Media Pluralism 2016. Monitoring the Risks to Media Pluralism in the EU (plus Turkey and Montenegro). National report: Bulgaria. (2016) - <https://op.europa.eu/bg/publication-detail/-/publication/ac565076-e46f-11e7-9749-01aa75ed71a1/language-bg>
- Spasov Orlin. (Спасов, О.) (2006). За пропагандата между обучението по журналистика и медийната практика: няколко структурни аргумента. [За propastta mezhdru obuchenieto po zhurnalistika i mediinata praktika: nyakolko strukturni argumenta]. (About the Gap between Journalism Education and Media Practice: a Few Structural Arguments) В: *Публична комуникация, глобализация и демокрация*. [In: *Publichna komunikaziya, globalizaciya I demokraziya*]. (In: *Public Communication, Globalization and Democracy*)
- Tabakova, B. (Табакова, В.) (2006). Етични стандарти и медийната саморегулация. В: *Въпроси на медийната саморегулация*, София. Българска медийна коалиция [Etichni standarti i mediinata samoregulatsiya. V: *Vÿprosi na mediinata samoregulatsiya*. Sofiya, Bÿlgarska mediina koalitsiya]. (Ethical Standards and Media Self-Regulation. In: *Issues of Media Self-Regulation*. Sofia, Bulgarian Media Coalition).
- Tanchev, E. (Танчев, Е.) (2002). Основни права на човека София: Юриспрес, Университетско издателство "Св. Климент Охридски". [Osnovni prava na choveka. Sofiya Yurispres, Universitetsko izdatelstvo "Sv. Kliment Okhridski"]. (Basic Human Rights. Sofia: Jurispress, University Publishing House "St. Kliment Ohridski").
- Television across Europe, More Channels, Less Independence*. (2008). Monitoring Report. Budapest: Open Society Institute. [https://www.opensocietyfoundations.org/uploads/3acad107-4566-48d6-bc17-1e6e98c00b41/1fullpublication\\_20080429\\_0.pdf](https://www.opensocietyfoundations.org/uploads/3acad107-4566-48d6-bc17-1e6e98c00b41/1fullpublication_20080429_0.pdf)
- The St. Kliment Ohridski Sofia University. <https://authors.uni-sofia.bg/>
- The World Bank (2022). GDP Growth (annual %). <https://data.worldbank.org/indicator/NY.GDP.MKTP.KD.ZG?locations=BG>
- Todorov, P. (Тодоров П.) (2015). Дефицити в медийния лабиринт на прехода. [Todorov, P. *Defitsiti v mediiniya labirint na prekhoda*]. (Todorov, P. *Deficits in the Media Labyrinth of the Transition*). [https://www.unwe.bg/uploads/ResearchPapers/Research%20Papers\\_vol1\\_2015\\_No3\\_P%20Todorov.pdf](https://www.unwe.bg/uploads/ResearchPapers/Research%20Papers_vol1_2015_No3_P%20Todorov.pdf)
- Union of Bulgarian Journalists <https://www.sbj-bg.eu/>
- Union of Bulgarian Journalists (Съюз на българските журналисти). (01.12.2016). *Общото събрание на СБЖ обсъжда предложения за законодателни промени* [Sÿyuz na bÿlgarskite zhurnalisti. *Obshtoto sÿbranie na SBZH diskutira predlozheniya za zakonodatelni promeni*]. (Union of Bulgarian Journalists. *The General Assembly of the Union of Bulgarians Discusses Proposals for Legislative Changes*. <https://sbj-bg.eu/index.php?t=33757>
- Union of Bulgarian Journalists (2004). *Ethical Code of Bulgarian Media*. <https://www.sbj-bg.eu/index.php?t=58>
- Union of Publishers in Bulgaria <https://sib.bg/>
- Valchanov, Ivan. (Вълчанов, И.) (2012). Професионални компетенции и умения в онлайн журналистиката. [Profesionalni kompetentsii i umeniya v onlaiyn zhurnalistikata. Medii i obshtestveni komunikatsii, (Professional Competencies and Skills in Online Journalism. Media and Public Communications). В: *Медии и обществени комуникации*, бр. 14/ Септември 2012. [Profesionalni kompetentsii i umeniya v onlaiyn zhurnalistikata. In: *Medii i obshtestveni komunikatsii*, No. 14/ Septemvri 2012.] (In: *Media and Public Communications*, No. 14 / September 2012.) <https://media-journal.info/?p=item&aid=204>
- Vasilev, S. (Василев, С.) (2020). *Допуски от хаоса на времето*. София: Сивас [Dopiski ot khaosa na vremeto. Sofiya: Sivas]. (*Contributions to the Chaos of Time*. Sofia: Sivas)

- Veleva, S. (Велева, С.). (2022). *Свобода на словото*. [Svoboda na slovoto]. (Freedom of Speech). Sofia: The St. Kliment Ohridski Publ. House.
- Vulfov, I. (Вълков, И.) (2020). *Журналистика без маски*. Годишно изследване за свободата на изразяване в България. [Zhurnalistika bez maski. Godishno izsledvane za svobodata na izrazuvane v Bŭlgariya]. (Journalism without Masks. Annual Study on Freedom of Expression in Bulgaria). Association of European Journalists, 2020. <https://aej-bulgaria.org/wp-content/uploads/2020/10/Jurnalisti-bez-maski-1.pdf> (in Bulgarian)
- YouGov <https://yougov.co.uk/>
- Zahariev, M. (Захариев М.) (2015). Цифровото бъдище - а сега накъде? В: Николова, Р. (съст.). Медиите в България: 25 години по-късно. София: Нов български университет, с. 222-240. [Zahariev M. Tsifrovoto bŭdeshte - a sega nakŭde? V: Nikolova, R.(sŭst.). Mediite v Bŭlgariya 25 godini po-kŭсно. Sofiya: Nov bŭlgarski universitet]. (Zahariev M. The Digital Future – Where to Go Now? In: Nikolova, R.(ed.) The Media in Bulgaria 25 Years Later. Sofia: New Bulgarian University.
- Zankova B., Glowacki M. (2019). *Bulgaria: Regaining Media Freedom*. In: Eberwein T., Fengler, S., Karmasin M. (eds.). *Bulgaria: Regaining Media Freedom*. The European Handbook of Media Accountability. Routledge.
- Zankova, B. (Занкова, Б.). (2021). *Българската медийна система – институционни и регулативни аспекти*. [Bŭlgarskata mediina sistema – institutsionni i regulativni aspekti]. (The Bulgarian Media System – Institutional and Regulatory Aspects). <http://mediacom21.bg/>; see also: Занкова, Б. (Zankova, B). *Преходът, медийните издания и медийната система в България*. [Prehodat, mediinite izdania i mediinata sistema v Bŭlgaria] (Transition, Media Editions and the Media System in Bulgaria). <http://mediacom21.bg/analizi>.
- Zankova, B. (2014). *Governance, accountability and transparency of public service media in a contemporary mediatised world: the case of Bulgaria*. In: M.Głowacki, and L. Jackson (eds.), *Public media management for the twenty-first century: Creativity, innovation and interaction*. New York and London: Routledge, 125 - 142.
- Zankova, B., Kirilov, S. (2014). *Watchdog or Underdog: How Ethical Is the Bulgarian Media?* In: Glowacki, M., Lauk, E., Balcytiene, A. (eds.). *Journalism that Matters: Views from Central and Eastern Europe*. Bern: Peter Lang. Pp. 115-128.
- Zankova, B. (2013). *Regulation in the new media environment – problems, risks and challenges from the perspective of the experience in five European democratic countries*. <https://litenet.bg/publish28/bisera-zankova/reguliraneto-en.htm>

